File ID Numb	er: HWCB2016433	DEQ/DWM/Hazardous Waste Section
NCD/NCR (ot	her) Number: NCD074505850	
Facility Name	: Mast Brothers IBC Cleaning	
Address: 725	4 Mt. Holly Rd.	City: Charlotte
County: Mecl	klenburg	
File Date Ran	ge: 8/17/94—9/18/98	
Document Ty	rpe (s)	
	Inspection Reports	
	*NOV (See Comments)	
	* Compliance Orders/Settlement Ag	reement (See Comments)
	*(Provide NOV Type, Docket Number	er and Date of NOV in Comment Section)
X	Correspondence/Letters	
	Pictures (Tape to a full sheet of paper	er)
	** Name Change and Date of Chang	e
	** (Write Name Change Information	in Comment Section)
	Sampling Data	
	Other Information (See Comments)	
Comments:		



JAMES B. HUNT JR. GOVERNOR

WAYNE MCDEVITT SECRETARY

WILLIAM L. MEYER DIRECTOR



NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT



RE EPA ID NO .: NCD074505850

Dear Sir/Madam:

September 18, 1998

7254 MT HOLLY RD

DANA TRANSPORT INC

CHARLOTTE NC 28214-

Based on information received by this office for the site identified with the EPA ID number, the state has accepted and processed the change in RCRA classification or information for the above site.

Please verify the computer generated information on the attached report and notify us of any corrections. We are advising EPA of the changes.

Enclosed you will find some information we hope will be helpful. If you have any questions or if I can be of any further assistance, please call me at (919)733-2178 ext.209.

Sincere

R. J. Dowards, Administrative Assistan

Division of Waste Management

cc: JOE PARKER

State of North Carolina **Department of Environment** and Natural Resources

Division of Waste Management

September 18, 1998

m 410 - 14 4



Head Oil Eval Marketor

Notification of Hazardous Waste Report Current Computer Record

'X' indicates operation status of your facility.

EPA ID#:

NCD074505850

Company name: DANA TRANSPORT INC

Owner:

RONALD B DANA

Contact:

FRANK RIDDLE, TERMINAL MGR

Phone number: 704/399-3395

Location address: 7254 MT HOLLY RD

City, St & ZIP:

CHARLOTTE, NC 28214-

Generator	190	Used Oil Fuel Marketer			
X LARGE GENERATOR SMALL QNTY GENERATOR EXEMPT SMALL QNTY LG QNTY. UNIVERSAL	STORES TREATER DISPOSER	Marketer directs shipment of used oil to off-specification burner Marketer who first claims the used oil meets specifications			
Transporter	Hazardous Waste Fuel	Used Oil Burner-Combustion Devices			
For own waste only X For commercial purposes	Gentr marketing to burner Other marketers Burner 1. Smelter deferral	Utility Boiler Industrial Boiler Industrial Furnace			
Transportation	2. Small qunt. exempt	Used Oil Transporter Activities			
Air		Transporter			
Rail Highway	Combustion Devices	Transfer facility			
Water	Utility boiler	Used Oil Processor/Re-refiner Activities			
Other	Industrial boiler	Process			
	Industrial furnace	Re-refine			

Please notify us if there is any further change in your operation which would affect your status specifically Company's Name, Ownership, Address, Contact or Telephone Number.

Your EPA ID number is currently active.

RCRA INSPECTION REPORT

X = VIOLATION NOTED NA = NOT APPLICABLE

Facility Name: Dana Transport Inc. Location: 7254 Mt. Holly Road, Charlotte, N.C. 28214 Mailing Address: EPA ID#: NCD 074 505 850 Phone Number: (704) 399-3395 Contact/Title: Frank Riddle - Terminal Manager Inspection Date: May 3, 1999 Last Inspection: Jan. 28, 1997 Type of Inspection: CEI Status: LOG Inspector(s): Joseph Parker - Waste Management Specialist, <u> Graham - Waste Management Specialist</u> Present at Inspection: <u>Frank Riddle - Dana Transport, James Adams</u> Container Manager Type of Business: Dana Transport, Inc. is listed as a Large Quantity Generator of hazardous waste and operates as a tank washing facility at this location. The previous inspection, conducted on January 28, 1997 indicated that the facility washes both truck tankers and IBCs. The facility has recently merged with Mast Bros. Tank Cleaning. But the Corporate President, Mr. Ronald B. Dana and their environmental contact, Mr. Daniel J. Bonanni, have still retained their former positions. The facility is currently undergoing physical changes to go to an IBC washing facility only. Mr. Adams told me that the facility will not be washing tanker trucks anymore. Currently, they are not performing any cleaning operations at the facility. No hazardous waste has been generated since the first part of April. The following hazardous wastes have been Wastes Generated: generated since the last inspection: D001 -Waste Flammable Liquids (ink, varnish) D001 -Waste Resin Solution D001 -Waste Flammable Liquid (ethanol, varnish) Waste Flammable Liquid (napthol, latex) D001 -D001,F003 -Waste Flammable Liquid (xylene, toluene) D001,F003 -Waste Flammable Liquid (xylene, acetone) D004, D006, D007, D008 -Hazardous Waste Liquid (CCA solution) F002, D039, D040 Hazardous Waste Liquid (Tetrachloroethylene, Trichloroethylene) Approved Transporters ? Yes Manifests: Approved TSDF ? Yes_ Filled Out Correctly ? Yes Signed Copies ? No LDR Notification Attached ? No The facility 1997, 1998, and 1999 hazardous waste manifests were reviewed. The following deficiencies were noted: (1) facility failed to have a land disposal restriction form attached to the following manifest # 52042 (03-05-98). (2) The facility failed to have a signed copy for hazardous waste manifest # 82198 (09-23-98).

	Page Two - RCRA Inspection Report Facility Name: Dana Transport, Inc.
	EPA ID#: NCD 074 505 850 Inspection Date: May 3, 1999
	Transporters: Omni Transport - SCR 000 002 964 Clean Venture - NJD 000 027 193 Maumee Express - NJD 986 607 380
	TSDs: Southeastern Chemical & Solvent - SCD 036 276 626 Remtech Env. Lab - PAD 067 098 822 Cycle Chem, Inc NJD 002 200 046
	Waste Minimization: The facility does have a written plan that includes management support, improved waste characterization, and periodic waste min. assessments.
> :	Inspection Records: Evidence that inspections are conducted: The facility does conduct weekly inspections. The facility failed to perform these weekly inspections between Feb. 14, 1999 and Mar. 17, 1999. The facility had a shipment of hazardous waste on Mar. 17, 1999. STATION NEW INSPECTIONS - New Plans Inspections on Storage Area: Yes, documented Inspections on H.W. Tanks: N/A Inspections on Ancillary Equipment: N/A
	Contingency Plan: On-Site ? Yes Any changes to facility/processes or Emergency Coordinator since last review? Yes, both emergency coordinators have been changed since the last inspection. The necessary amendments have been made. The following deficiency was noted during the inspection: (1) No home addresses were listed for the facility emergency coordinators - Mr. Riddle and Mr. Adams.
	Contingency Plan Implemented? No (If yes, was it adequate?)
	Agreements with Emergency Responders? <u>Yes, documented in</u> contingency plan
	Training Records: Certified Training Documents Available? Yes
	New Employees Since Last Inspection? Yes
	Evidence of Improper/Inadequate Training? The facility failed to provide an annual update for Mr. Riddle and Mr. Adams. Their last RCRA training date was Feb. 2, 1998.
	Annual Report Submitted? Yes
>	Closing All records on DANA (STARFING NEW RECORDS for MAST) BLOS.
	Eros.

Page Three - RCRA Inspection Report

Facility Name: Dana Transport, Inc.

EPA ID#: NCD 074 505 850 Inspection Date: May 3, 1999

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? <u>Releases of hazardous waste and petroleum material were observed during the inspection. These areas will be noted later in the report.</u>

Internal Communications or Alarm Present? The facility has public address system/intercom and a fog horn for emergencies.

Portable Fire Extinguishers and/or Fire Control Equipment? The facility has fire extinguishers throughout the facility.

Spill Control Equipment: <u>The facility has a variety of equipment including absorbents (pigs)</u>, shovels, overpack drums, and ppe.

Adequate Water Volume, Foam Equipment or Auto Sprinklers? <u>The facility has auto sprinklers in the office area only.</u>

All Equipment/Alarms Tested and Maintained? <u>All equipment and alarms are checked weekly.</u>

All Personnel Handling HW have Access to Alarm/Device? <u>Yes. phones</u> in each bay

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): 0

Location(s): <u>The facility does not have any satellite accumulation areas for hazardous waste</u>. Facility personnel indicated that no hazardous waste has been generated since the first part of April.

Satellite Containers: Closed? N/A

Labeled/Contents Identified? N/A _____

< 55 Gallons? <u>N/A</u>

Releases? N/A

Storage Area(s):

Description(s): The facility does not have any hazardous waste in storage. During the walk through portion of the inspection, numerous containers were observed to be stored behind the main building. Among these containers, 1-55 gallon container was observed with a hazardous waste label on it's side. The label indicated that container held or once held D004, D006, D007 hazardous waste (Copper Sulfate). Mr. Adams told me that the container was used to hold this material at one time. The container was observed with holes, caused by rusting, on it's sides. The container had a small amount of material inside the container. The container was not considered RCRA empty at the time of the inspection. Evidence of the material was also observed on the ground surrounding the container, Mr. Adams indicated that the material on the ground surrounding the container was the same Page

Four - RCRA Inspection Report

Facility Name: Dana Transport, Inc.

EPA ID#: NCD 074 505 850 Inspection Date: May 3, 1999

material found inside the container. Pictures were taken of the container.

Containers: Closed? No Aisle Space? Yes Labeled? Yes

Dated? Yes Evidence of Release? Yes

< 90 Days? Yes Good Condition? No

Other HW Units: (Applicable Regulations)

Description of Unit: During the walk through portion of the inspection, an oil/water separator was noted near the water treatment area. Releases of used oil related material was observed surrounding the area where this unit was located. Mr. Adams indicated that this unit had just been cleaned out. I told Mr. Adams that this area would need to be cleaned up and the remediated material would have to handled properly. Pictures were taken.

External Facility Condition: The facility had numerous open containers located behind the facility. Mr. Adams indicated that the containers were mostly rainwater with some non-hazardous process water. The facility plans on handling this material in their wastewater treatment area.

Site Deficiencies: The following violations were noted during the inspection conducted on May 3, 1999:

1. 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.171, states that if a container is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

During the inspection, 1-55 gallon container marked as holding D004, D006, D007 hazardous waste was noted as rusted and in poor condition. Any hazardous waste in this container must transferred to a container in good condition.

transferred to a container in good condition.

2 NUMPROKAS - LONG - SENT OUT 6-7-91 - HN OMNI

2. 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174, states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the inspection, it was noted that the facility failed to conduct weekly inspections on containers of hazardous waste between February 14, 1999 and March 17, 1999.

Someton New Inspection Low for weekly inspection

3. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c), states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Page Five - RCRA Inspection Report

Facility Name: Dana Transport, Inc.

EPA ID#: NCD 074 505 850 _ Inspection Date: <u>May 3, 1999</u>

During the inspection, it was noted that the facility failed to provide personnel with an annual review of their initial hazardous waste training. During the inspection, it was found that the facility failed to train Mr. Frank Riddle, who holds the title of Terminal Manager and Mr. James Adams, who holds the title of Container Manager in the required 365 day time limit. Both Mr. Riddle and Mr. Adams were last documented as being trained in hazardous waste management on February 28,

7 1998. 6-7.99- & employees trained it UW MANAGEMENT

40 CFR 262.34(a)(4) ref. 40 CFR 265.31, states that a facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, releases of hazardous waste were noted on and around 1-55 gallon container marked as D004, D006, D007 - Copper Sulfate. The container was located behind the main building and group among other empty containers. The releases were noted on the bottom of the container and on the concrete pad, which the container was placed on. SAYING MAS probably bore - they really do

40 CFR 262.34(a)(4) ref. 40 CFR 265.52(d), states that the wife known contingency plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency where. coordinator (see 265.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

During the inspection, it was noted that the facility failed to list the home addresses for the emergency coordinators at the facility. Emergency coordinators at the facility. Emergency coordinators at

40 CFR 262.42(a)(2), states that a generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

Page Six - RCRA Inspection Report

Facility Name: Dana Transport, Inc.

EPA ID#: NCD 074 505 850 Inspection Date: May 3, 1999

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

During the inspection, it was noted that the following hazardous waste shipment did not have a signed copy of the manifest attached: #82198(09-23-98). Fay received 6-3-99 Output WAS IN file 1

40 CFR 268.7(a) (3), states that generators must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this section for at least three years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The three year retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2 through 261.6, or exempted from Subtitle C regulation, subsequent to the point of generation.

During the inspection, it was noted that the following hazardous waste shipment did not have a land disposal restriction form attached to the manifest: #52042(03-05-98)

Received on 5-5-99. 4 James Adams

- 8. 40 CFR 279.22(d), states that upon detection of a release of used oil to the environment not subject to the requirements of Part 280, subpart F of this chapter which has occurred after the effective date of the authorized used oil program for the State in which the release is located, a generator must perform the following cleanup steps:
 - (1) Stop the release;
 - (2) Contain the released used oil;
 - (3) Clean up and manage properly the released used oil and other materials; and
 - (4) If necessary to prevent future releases, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

During the inspection, oil stained areas were observed around the facility's oil/water separator. These areas must be remediated and the resulting contaminated soil must be handled properly. This soil can be handled as a used oil material. The facility must ensure that in the future, releases of used oil are eliminated.

Planning on discontinuing this und - Will remediate the synnomialing soil.

Unit will be out within the ment week

7.

Page Seven - RCRA Inspection Report Facility Name: Dana Transport, Ir	nc	
EPA ID#: NCD 074 505 850	_ Inspection Date: <u>May</u>	<u>3, 1999</u>
Recommendations:	·	
 During the inspection, it was numerous open fifty-five gallo behind their main building. holding rainwater, process recommended that the facility other way. 	on containers in the area These containers were mater, and trash.	located noted as It is
Comments:		
The above site deficiencience enforcement document, that we contral Office. Dana Transpafter the date of issue, to document. If the facility he some parker at the Mooresville	vill be issued from the cort, Inc. will have a come into compliance was any questions please	Raleigh 30 days, ith this contact
Inspector (Date)	(CERTIFIED MAIL) Facility Contact	(Date)
Thispector (Date)	racifity contact	(Date)
Follow Up Inspection:		
Comments:		
Comments:		

Inspector

(Date)

Facility Contact

(Date)

550 Industrial Drive Lewisberry, PA 17339-9537

March 24, 1998

PA Department of Environmental Protection Bureau of Waste Management P.O. Box 8550 Harrisburg, PA 17015-8550

RE: MANIFEST CORRECTIONS

Remtech Environmental Lewisberry, Inc.

EPA ID # PAD067098822

Dear Sir or Madam:

We have recently discovered the manifest concerns listed below and ask you to make the corrections described. If a correction to piece count or bulk volume (SECTION 12 and/or 13) is shown below you are being advised of these changes in accordance with Title 25 PA Code 264.72(b) (requiring written notification where manifest discrepancies have not been resolved within three (3) days of receiving the waste).

Please make the following changes to the Hazardous Waste Manifest no. PAE (151041 shipped on 3-/2-98 A copy of the manifest in question is attached.

section //a	SHOULD READ RQ Waste Flammable liguid, ND.S. (Methylene, Chloride) 3, NA1993, PG III, ERGH 128
11 at I	add 0001
J6_	_SL

We have contacted all the parties to the manifest to request that these changes be made. Please file this letter in a safe place. If you have any questions please feel free to contact me at (717) 938-4700 ext. 202.

Sincerely,

Rita Black Manifest Clerk

cc: Other State Environmental Agency (as necessary)

Named Generator Named transportor

> YOUR COMPLIANCE SCIENCE PARTNER 717-938-4700 FAX 717-932-7786

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION Bureau of Land Recycling and Waste Management P.O. Box 8550 Harrisburg, PA 17105-8550 OFFICIAL PENNSYLVANIA MANIFEST FORM

BR004198

Form approved. OMB No. 2050-0039 Expires 9-30-96

SPA-FM-LRWM0051 REV. 11/95 OFFICIAL PENNS	SYLVANIA MANIFES	TFORM			la de	1350	Expires 9-30-96
UNIFORM HAZARDOUS WASTE MANIFÉST N:C D 0:7 4:5 0:5	Doc	anifest cument No.	2. Page of		required required	by Federal la by State law	e blue border is not aw but may be
3. Generator's Name and Mailing Address Dana Container, Inc.			A. State	PA	ot Docume	815	2042
7254 Mount Holly Road, Charlotte, NC 28. 4. Generator's Phone (704) 399-3395	214		B. State	Gen. (D	ane		
Maumee Express. Inc. N J D 9	6. US EPA ID Number 8 6 6 0 7 8. US EPA ID Number	3 8 0		Trans.	ll.	20	
7. Transporter 2 Company Name 11. 0.1.1.1.0.0.0.0.0.0.0.0.0.0.0.0.0.0.	8. US EPA ID Number	380	E. State	Trans. I	Phone (24-8441
9. Designated Facility Name and Site Address Remtech Environmental Lewisberry,				A-Al	Phone (
550 Industrial Drive		0 1 1	G, State	Facility	's ID		
Lewisberry, PA 17339 P A D C	0:6:7:0:9:8	12. Contai		ity's Pho	13. Total	14. Uni	t Waste No.
a. RQ, Hazardous Waste Liquid, n.o.s., 9, N.	A3082, PGIII	No.	Type		Quantity	Wev	D039
(Trichloroethylene, Tetrachloroethylene) (FOO2, DO40, DO39, DO33, DO32, DO30)	(ERG#171)	x x 2	D M	хх	1 1	0 G	D040 F002
b. RQ, Waste Flammable Liquids, n.o.s., 3, (Ethanol, Varnish)	UN1993, PGII	<i>a</i> .					1 9
© RQ, Waste Flammable Liquids, n.o.s., 3,		x x 6	D M	X X	3 3	0 G	D001 X
(Napthol, Latex)		x x 1	D M	x x	x 5	5 G	D001
d.	31						
					-		
J. Additional Descriptions for Materials Listed Above Lab Pack Physical State DCS010-A-SSM Lab Pack	Physical State, DCSC	10-C-FW	K. Handli A	ng Code	s for Wast	es Listed At	
a. f L T E c.	LI		a. 、	<u>Su/</u>		د. کی	
b. L I DCS010—B—FM1 d. L			D.	SO		d.	
15. Special Handling Instructions and Additional Information a) (Carbowax/late	ex 70-75%, Starci 01%,2.4-Dinitro	n,carbon s otoluene !	edine 017.	nt 20 Hexac	-25%, hlorob	Trichlo enzene	roethylene 0- 0-,1%.Hexa-
chloro-1,3-Butadiene O1%, Speedi-dry O-10%) Also b) (Ink 50-70%, Varnish 20-40%, Ethenol 5-40%)	: DO33, DO32, DO30						
Emergency Contact 1-800-243-3452	-, (,						,
Plate# 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of							
classified, packed, marked and labeled and are in all respects in proper condition for If I am a large quantity generator, I certify that I have a program in place to re practicable and that I have selected the practicable method of treatment, storage, o the environment; OR, if I am a small quantity generator, I have made a good faith or the service of the practicable method of the storage of the service	educe the volume and toxic or disposal currently availab	city of waste ge ale to me which	nerated to minimizes	the de	gree I hav sent and t	e determine future threat	to be economically to human health and
to me and that I can afford. Printed/Typed Name	Signature	F 1	id			MONT	H DAY YEAR
17. Transporter 1 Acknowledgement of Receipt of Materials	TAN-	1	1/6	MIN	12		0106140
Printed/Typed Name CHUCK CF EN CEN 18. Transporter 2 Acknowledgement of Receipt of Materials	Signature	Lean	-		1	MONT O	10698
Printed/Typed Name Elaun 20 HAWA125	Signature	24.2			. 30	MONT	H DAY YEAR
19. Discrepancy Indication Space ELF) Same as CAP				7,			
4	1						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by Printed/Typed Name/	this manifest except, as no	ted in item 19/	ch			BONA	H DAY SYEAR
Jan 5 Final Claims	James	1	U	La	NIL	103	310.5198
Form 8700-22 (Rev. 9/88) Previous editions are obsolete	1						

MEMORANDUM Hazardous Waste Section

To: Joe Parker, Waste Management Specialist

From: Roberta Proctor, Environmental Chemist

Date: February, 9, 2000

RE: Dana Transport Sample Results

I have reviewed the laboratory results for soil and water samples collected at the Dana Transport Facility, Charlotte, North Carolina. The first table shows the compounds in the soil samples that exceed the Hazardous Waste Section Soil Screening levels which are the levels that would define a site as "clean-closed" with no further remediation necessary. The second table shows the compounds in the groundwater sample that exceed the North Carolina 2L groundwater standards.

Soil Samples

Compound	SS Level	SB-1	SB-2	SB-3	SB-4	SB-5			
Oil and Grease (mg/kg)	250	960		300	260	300			
Ethylbenzene (ug/kg)	241	290							

Groundwater Samples

Compound (ug/kg)	NC 2L Standard	Groundwater Sample Result
Chloroform	0.19	1.0
Tetrachloroethene	0.7	9.6
Trichloroethene	2.8	5.2

DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

ACTIVITY REPORT

SUBJECT: Dana Transport, Inc.

LOCATION: Mecklenburg Co. DATE: November 5, 1999

ADDRESS: 7254 Mount Holly Road TIME SPENT: 3 hr

CITY: Charlotte STATE: N.C. ZIP: 28214

BY WHOM: Joseph Parker - Waste Management Specialist

PERSONS CONTACTED: Carl Cline - Mast Brothers Tank

Max Mast - Mast Brothers Tank Gabby Smith - Mast Brothers Tank

Colleen Bay - Geo-Environmental Consultants

REASON FOR VISIT: Sampling of Oil/Water separator area

COPIES TO: Jesse Wells - Western Area Supervisor

File

REPORT:

On the above day, the writer, Joseph Parker, Waste Management Specialist with the N.C. Hazardous Waste Section attended a sampling event at Dana Transport, Inc. The facility is located at 7254 Mount Holly Road, Charlotte, Mecklenburg Co., N.C. The area to be sampled was where an oil/water separator was noted during previous inspections. This oil/water separator has now been excavated and the sampling is being conducted to confirm if any contamination still exists.

Upon arriving onsite, I met with Mr. Carl Cline, Mr. Max Mast, and Mr. Gabby Smith, all with Mast Brothers Tank Cleaning. We then walked behind the facility to the area to be sampled. They have contracted with Geo-Environmental Consultants to take the samples needed. Ms. Colleen Bay would be taking the samples for Geo-Environmental.

All together, five samples were taken of the area. The following observations were taken during the sampling operation:

Sample 1 - Taken approximately 6 feet from the building in the middle of the excavated area. Sample material was taken at approximately 7 to 7 1/2 feet. The change of color in the sample dirt occurred between 6 and 7 feet. The sampler (Ms. Bay) indicated that an

odor was present in the sample of material. The color of the soil was green/brown and was taken at 9:51 am. Labeled as SB-1.

- Sample 2 Taken approximately 12 inches from the building. Sample material was taken at approximately 3 feet. Soil color was a light orange and was taken at 10:05 am. No odor indicated in the sample. Labeled as SB-2.
- Sample 3 Taken approximately 8 to 9 feet from the building, parallel with the metal post on the right. Sample material was taken at approximately 3 feet. Soil color was reddish and was taken at 10:15 am. No odor indicated in the sample. Labeled as SB-3.
- Sample 4 Taken approximately 18 feet from the building, in line with Samples 1 and 2. Sample material was taken at approximately 3 feet. Soil was red/rocky and was taken at 10:36 am. No odor indicated in the sample. Labeled as SB-4.
- Sample 5 Taken approximately 9 feet from the building, on the left side and was close to being parallel with Samples 1 and 3. Sample material was taken at approximately 3 feet. Soil was red/rocky and was taken at 10:48 am. The sampler (Ms. Bay) indicated that an odor was present in the sample. Labeled as SB-5.

Once the samples were taken, I left the site. Facility personnel indicated that they would forward the results of the sample analysis to the Raleigh Office when they become available.

ACTIVITY TYPE: CHECK MOST APPROPRIATE

1. COMPLAINT

2. SPILL
3. TECHNICAL ASSISTANCE

4. REMEDIAL ACTION (other than WPCA)

5. PRESENTATION

6. TRAINING

7. MEETING

8. SAMPLING - x

5 Amplivy - Dank Teansport 5B

1. ph dollo saaple 7-74 feet.

change between 6-7 green/brown 9:51

2. It inches som building 3ft. Jour - 10:05

561 - Light orange

3. Set from 2021 (metal) 8-9 ft for Blace.

3. 5ft from post (metal) 8-9 ft from Blag.
3ft down 10:15

4. 18 ft from Building
New 3ft. 10:36

J. 96t from Building 10:48
Pedfacely odor



GEO-ENVIRONMENTAL CONSULTANTS, INC.

11704 Reames Road Charlotte, NC 28269 Telephone: (704)596-8788 Fax: (704)596-8770

FACSIMILE TRANSMISSION

FAX TO:	Nos S. Parker	DATE:	11/30/9	5
COMPANY:	UCHENE	FAX NO:	663-604	0
FROM:	Collien & Boy	TOTAL PAGES:	3	
PROJECT#:	99187	}	(Including Co	ver Sheet)
RE:	Laboratory R	exulty for	the Danc	Transport
·	Facility for	Host Both	ers, Char	latte, ix
MESSAGE:	1 ,	•	•	• • •

PRINCIPAL'S INTITALS DON 6 DI

THE INFORMATION CONTAINED IN THIS FACSIMILE IS PRIVILEGED AND CONFIDENTIAL, INTENDED FOR THE SOLE USE OF THE ADDRESSEE. IF THE READER OF THIS FACSIMILE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED BY LAW. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY THE PERSON LISTED ABOVE, IMMEDIATELY, AND RETURN THE ORIGINAL BY MAIL TO THE SENDER AT THE ADDRESS LISTED ABOVE.

GEOTECHNICAL AND ENVIRONMENTAL ENGINEERING SERVICES



RECEIVED NOV 2 3 1999

11/19/1999

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: WS

Prism Sample ID: AB47644

Login Group: 3593F1

14:00

Sample Collection Date/Time: 11/5/1999 Lab Submittal Date/Time: 11/5/1999

14:25

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
TICS BY SEMIVOLATILE GC/MS				625/8270	11/11/1999 00:34	
625/8270 Tentatively Iden	stified Compo	110-la	rgest TICs)			,
<pre><identification class=""></identification></pre>		losest Spec		<est. conc.=""></est.>		
Unknown	(T	etrachloroe	thylene)	8 ug/L		
BROMODICHLOROMETHANE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
BROMOFORM	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
BROMOMETHANE	Not detected	ug/L	5	EPA 601/602	11/18/1999 10:03	DR2
CARBON TETRACHLORIDE	Not detected	ug/L	1	EPA 601/802	11/18/1999 10:03	B DR2
CHLOROBENZENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	B DR2
CHLOROETHANE	Not detected	ug/L	. 5	EPA 601/602	11/18/1999 10:03	DR2
CHLOROFORM 6.19	1.0	ugit Care	9/ 1	EPA 601/602	11/18/1999 10:03	DR2
CHLOROMETHANE	Not detected	ug/L	5	EPA 601/602	11/18/1999 10:03	DR2
DIBROMOCHLOROMETHANE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
1,2-DIOHLOROBENZENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
1,3-DICHLOROBENZENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
1.4-DICHLOROBENZENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
DICHLORODIFLUOROMETHANE	/ Not detected	ug/L	5 1	EPA 601/602	11/18/1999 10:03	DR2
1,1-DICHLOROETHANE 70	1.7	ug/L. 19	1	EPA 601/602	11/18/1999 10:03	DR2
1,2-DICHLOROETHANE	Not detected	uġ/L	1	EPA 601/602	11/18/1999 10:03	DR2
1,1-DICHLOROETHENE	Not detected	ug/L	1	EPA 601/602	11/18/1929 10:03	DR2
TRANS-1,2-DICHLOROETHENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
1,2-DICHLOROPROPANE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
CIS-1,3-DIGHLOROPROPENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
TRANS-1,3-DICHLOROPROPENE	Not detected	ug/L	5	EPA 601/602	11/18/1999 10:03	DR2
EDB	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	
METHYLENE CHLORIDE	Not detected	ug/L	5	EPA 601/602	11/18/1999 10:03	DR2
1,1,2,2-TETRACHLOROETHANE	Not detected	ug/L	72 1	EPA 601/602	11/18/1999 10:03	DR2
TETRACHLOROETHENE	96	ug/L	40 1	EPA 601/602	11/18/1999 10:03	DR2
1,1,1-TRICHLOROETHANE	1,0	ug/L	1	EPA 601/602	11/18/1999 1D:03	DR2

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37735 - FL Certification N. E87519

449 Springbrook Road - P.O. Box 240543 - Charlotte, NC 28224-0543 Phone: 704/529-6364 - Toll Free Number: 1-800/529-6364 - Fax: 704/525-0409



11/19/1999

Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

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Customer Project ID: 99187

Customer Sample ID: WS

Prism Sample ID: AB47644

Login Group: 3593F1

Sample Collection Date/Time: 11/5/1999 14:00

Lab Submittal Date/Time: 11/5/1999 14:25

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

	TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
	1,1,2-TRICHLOROETHANE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
(TRICHLOROETHENE 2.8	5.2	ug/L 3554	1	EPA 601/502	11/16/1899 10:03	DR2
`	TRICHLOROFLUOROMETHANE	Not detected	ug/L	5	EPA 601/602	11/18/1999 10:03	DR2
	VINYL CHLORIDE	Not detected	ug/L	5	EPA 601/602	11/18/1999 10:03	DR2
	BENZENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
	ETHYLBENZENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
	IPE	Not detected	ug/L	5	EPA 601/602	11/18/1999 10:03	DR2
	MTBE	Not detected	ug/L	5	EPA 601/602	.11/18/1999 10:03	DR2
	TOLUENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
	TOTAL XYLENES	Not detected	ug/L	3	EPA 601/602	11/18/1999 10:03	DR2
(CIS-1,2-DICHLOROETHENE 70	ав	ug/L	1	EPA 601/802	11/18/1999 10:03	DR2
`							
	PREP. METHOD 625	Completed			.EPA 625	11/10/1999 14:00	LAC
	ACENAPHTHENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	ACENAPHTHYLENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	ANTHRACENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	BENZO(A)ANTHRACENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	BENZO(B)FLUORANTHENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	BENZO(K)FLUORANTHENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	BENZO(A)PYRENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	BENZO(GHI)PERYLENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	BIS(2-CHLOROETHOXY)METHANE	Not detected	na/L	10	EPA 625	11/11/1999 00:34	HWC
	BIS(2-CHLOROETHYL)ETHER	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	BIS(2-CHLOROISOPROPYL)ETHER	Not detected	ug/L	10	*EPA 625	11/11/1999 00:84	HWC
	BIS(2-ETHYLHEXYL)PHTHALATE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	4-BROMOPHENYL PHENYL ETHER	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	BUTYL BENZYL PHTHALATE	Nat detected	na/r	10	EPA 625	11/11/1999 00:34	HWC
	4-CHLORO-3-METHYLPHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	2-CHLORONAPHTHALENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
	2-CHLOROPHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37735 - FL Certification N. E87519

449 Springbrook Road ... P.O. Box 240543 ... Charlotte, NC 28224-0543
Phone: 704/529-6364 ... Toll Free Number: 1-800/529-6364 ... Fax: 704/525-0409



11/19/1999

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: WS

Prism Sample ID: AB47644

Login Group: 3593F1

Sample Collection Date/Time: 11/5/1999 14:00

Lab Submittal Date/Time: 11/5/1999 14:25

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
4-CHLOROPHENYL PHENYL ETHER	Not detected	μg/L.	10	EPA 625	11/11/1999 00:34	HWC
CHRYSENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
DIBENZO(A,H)ANTHRACENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
DI-N-BUTYLPHTHALATE	Not detected	ug/L	10	EPA 525	11/11/1999 00:34	HWC
1,2-DICHLOROBENZENE	Not detected	·ug/L	10	EPA 625	11/11/1999 00:34	HWC
1,3-DICHLOROBENZENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
1,4-DICHLOROBENZENE	Not detected	υg/L	10	EPA 625	11/11/1999 00:34	HWC
2.4-DICHLOROPHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HW¢
DIETHYL PHTHALATE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
2.4-DIMETHYLPHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
DIMETHYL PHTHALATE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWÇ
2.4-DINITROPHENOL	Not detected	ug/L	50	EPA 625	11/11/1999 00:34	HWC
2,4-DINITROTOLUENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
2,6-DINITROTOLUENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
DI-N-OCTYLPHTHALATE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
FLUORANTHENE	Not detected	υg/L	10	EPA 625	11/11/1999 00:34	HWC
FLUORENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
HEXACHLOROBENZENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
HEXACHLOROBUTADIENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
HEXACHLOROCYCLOPENTADIENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
HEXACHLOROETHANE	Not detected	ug/L	1 D	EPA 625	11/11/1999 00:34	HWC
INDENO(1,2,3-CD)PYRENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
ISOPHORONE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
2-METHYL-4,6-DINITROPHENOL	Not detected	ug/L	50	EPA 625	11/11/1999 00:34	HWC
NAPHTHALENE	Not detected	ug/L	10	-EPA 625	11/11/1999 00:34	HWC
NITROBENZENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
2-NITROPHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
4-NITROPHENOL	Not detected	ug/L	50	EPA 625	11/11/1999 00:34	HWÇ
N-NITROSODIPHENYLAMINE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
N-NITROSODI-N-PROPYLAMINE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC



11/19/1999

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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: WS

11704 Reames Road

Prism Sample ID: AB47644

Charlotte, NC 28269

Login Group: 3593F1 Sample Collection Date/Time: 11/5/1999

14:00

Lab Submittal Date/Time: 11/5/1999

14:25

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
PENTACHLOROPHENOL	Not detected	ug/L	50	EPA 625	11/11/1999 00:34	HWC
PHENANTHRENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:84	HWC
PHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:84	HWC
PYRENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
1,2,4-TRICHLOROBENZENE	Not detected	ug/L	10	EPA 625	11/11/1899 CO:34	HWC
2,4,5-TRICHLOROPHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:84	HWC
BENZIDINE	Not detected	ug/L	100	EPA 625	11/11/1999 00:34	HWC
1,2-DIPHENYLHYDRAZINE	Not detected	ug/L	100	EPA 625	11/11/1999 00:34	HWC
	•					•

Sample Comments:

Angela D. Overcash, V.P. Laboratory Services

Service Analytical & E	invironmental S	Solutions .		глав <u>{</u> 449 Sp P.O. Bo	or_ ringbro x 2405	auot ook Road 643 ← Ch	TODY F Charlotte Charlotte, NC 2 Fax: 704	, NC 2 8224	28217 -0543	· ·	PRO PRO Prece	ira pili Feri Fri	WET PO ESPRIVA THIN HO	LAB US manival? E7 Demp TYPES hades EDING-TIME	Y Q Jaji?	3/16	NA OFFICE	・・・シー) ・NOV.30.3
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CLIENT SAMPLE DESCRIPTION	DATE	TIME CDLLEGTED MILITARY ROUMS	MATRIX (SOIL, WATER OR SLUDGE)	SAMPI SEE BELOW	E CONTA	SIZE .	PRESERVA- TIVES, .	1	N9 7.	AIIAINSE	S REQU	ESTED		REI	млпкв	SUB CENT. ID NO.	PRISM LAB ID NO.	045968770
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*CONTAINED TYPE CODES: A = Amber - C = Clear : D = Class **P = Plastic; **TL = Tefon-Lined Cap : VOA = Volatile Organics Analysis (Zero Head Space)

SEE PEVERSE FOR TERMS & CONDITIONS FINAL REPORT COPY

NOV.30.1999 11:16AM

7045968770

NO.385



Full Service Analytical & Environmental Solutions

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11/19/99

Dave Stoner

Customer Project ID: 99187

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09:50

11:55

Geo-Environmental Consultants

11704 Reames Road

Charlotte, NC 28269

Customer Sample ID: SB-1

Prism Sample ID: AB47637

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

Lab Submittal Date/Time: 11/5/99

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
PREP. METHOD 3550	Completed				11/10/99 08:00	JDP
CALCULATIONS BASED ON DRY WT.	81	% DRY WT.	0.01	SM 2540 G	11/9/99 10:15	GAM
SW846 - 9071 TPH OIL AND GREASE	980	mg/kg 250	10	SW-846 #9071	11/9/99 11:30	LAC
BENZENE	Not detected	ug/kg	62	SW848-8260	11/11/89 15:57	MP
BROMOBENZENE	Nat detected	ug/kg	62	SW846-8280	11/11/99 15:57	MP
BROMOCHLOROMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
BROMODICHLOROMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
BROMOFORM	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
BROMOMETHANE	Not detected	ug/kg	124	SW846-8260	11/11/99 15:57	MP
N-BUTYLBENZENE	(250)	ug/kg 7 80	62	SW846-8260	11/11/99 15:57	MP
SEC-BUTYLBENZENE	170	ug/kg ეგ ^O	62	SW846-8260	11/11/99 15:57	MP
TERT-BUTYLBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
CARBON TETRACHLORIDE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
CHLOROBENZENE	(180)	ид/ка 438	62	SW846-8260	11/11/99 15:57	MP
CHLORODIBROMOMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
CHLOROETHANE	Not detected	ug/kg	124	SW846-8260	11/11/99 15:57	MP
CHLOROFORM	Nat detected	ug/kg	62	SW848-8260	11/11/99 15:57	MP
CHLOROMETHANE	Not detected	ug/kg	124	SW846-8260	11/11/99 15:57	MP
2-CHLOROTOLUENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
4-CHLOROTOLUENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2-DIBROMO-3-CHLOROPROPANE	Not detected	ug/kg	124	SW846-8280	11/11/99 15:57	MP
1,2-DIBROMOETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
DIBROMOMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2-DICHLOROBENZENE	Not detected	ug/kg	62	SW845-8260	11/11/99 15:57	MP
1,3-DICHLOROBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,4-DICHLOROBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
DICHLORODIFLUOROMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,1-DICHLOROETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2-DICHLOROETHANE	Not detected	ug/kg	62	SW846-6260	11/11/99 15:57	MP
1,1-DICHLOROETHENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP

Full Service Analytical & Environmental Solutions

11/19/99

Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

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Customer Project ID: 99187

Customer Sample ID: SB-1

Prism Sample ID: AB47637

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

09:50 11:55

Lab Submittal Date/Time: 11/5/99

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

	TEST PARAMETER	TEST RESULT	UNITS	MDL	· METHOD REFERENCE	DATE/TIME STARTED	ANALYST
	CIS-1,2-DICHLOROETHENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	TRANS-1,2-DICHLOROETHENE	Not detected	ug/kg	62	SW846-8260	11/11/99 16:57	MP
	1,2-DICHLOROPROPANE	Not detected	ug/kg	6 2	SW846-8260	11/11/99 15:57	MP
	1,3-DICHLOROPROPANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	2.2-DICHLOROPROPANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	1,1-DICHLOROPROPENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
(ETHYLBENZENE	280	ug/kg 2×9	62	SW846-8260	11/11/99 15:57	MP
•	HEXACHLOROBUTADIENE	Not detected	ug/kg	62	SW845-8260	11/11/99 15:57	MP
	ISOPROPYLBENZENE	Not detected	ug/kg	62	SW846-B260	11/11/99 15:57	MP
-	P-ISOPROPYLTOLUENE	(330)	ug/kg	62	SW845-8260	11/11/99 15:57	MP
	METHYLENE CHLORIDE	Not detected	ug/kg	1240	SW846-8260	11/11/99 15:57	мР
	NAPHTHALENE	(110)	ug/kg 5	62	SW846-8260	11/11/99 15:57	MP
	N-PROPYLBENZENE	100	ug/kg 780	62	SW846-8260	11/11/99 15:57	MP
	STYRENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	1,1,1,2-TETRACHLOROETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	1,1,2,2-TETRACHLORDETHANE	Not detected	ug/kg	62	SW845-8260	11/11/99 15:57	MP
	TETRACHLOROETHENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	TOLUENE	(67)	ug/kg 7 2.	70 62	SW846-8260	11/11/99 15:57	MP
	1,2,9-TRICHLOROBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	1.2.4-TRICHLOROBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	1,1,1-TRICHLOROETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 1 5:57	MP
	1,1,2-TRICHLOROETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	TRICHLOROETHENE	Not detected	ug/kg	62	SW846-8260	11/11/99 16:57	MP
	TRICHLOROFLUOROMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	WP.
	1,2,9-TRICHLOROPROPANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
	1,2,4-TRIMETHYLBENZENE	540	ug/kg	62	SW846-8280	11/11/99 15:57	MP
	1,3,6-TRIMETHYLBENZENE	(620)	ug/kg <	62	SW846-8260	11/11/99 15:57	MP
	VINYL CHLORIDE	Not detected	ug/kg	124	SW846-8260	11/11/99 15:57	MP
	TOTAL XYLENES	(450)	ug/kg	62	SW846-8250	11/11/99 15:57	MP
	2-BUTANONE (MEK)	Not detected	ug/kg	620	SW846-8260	11/11 /9 9 15: <i>5</i> 7	MP



Full Service Analytical & Environmental Solutions

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11/19/99

Customer Project ID: 99187

Geo-Environmental Consultants

Customer Sample ID: SB-1

Dave Stoner

11704 Reames Road

Prism Sample ID: AB47637

Charlotte, NC 28269

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

09:50 Lab Submittal Date/Time: 11/5/99 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
2-CHLOROETHYL VINYL ETHER	Not detected	ug/kg	124	SW846-8280	11/11/99 15:57	MP
4-METHYL-2-PENTANONE (MIBK)	Not detected	ug/kg	620	SW846-8260	11/11/00 15:57	MP
ACETONE	Not detected	ug/kg	1240	SW846-8260	11/11/09 15:57	MP
CARBON DISULFIDE	Not detected	บg/kg	1240	SW845-8260	11/11/99 15:57	MP
VINYL ACETATE	Not detected	ug/kg	620	5W846-8260	11/11/89 15:57	MP
CIS-1,3-DICHLOROPROPENE	Not detected	ug/kg	62	SW846-8260	11/11/89 15:57	MP
TRANS-1,3-DICHLOROPROPENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
2-HEXANONE	Not detected	ug/kg	620	SW846-8260	11/11/99 15:57	MP
!PE	Not detected	ug/kg	62	SW846-8250	11/11/99 15:57	MP
MTBE	Not detected	u g/ kg	62	SW846-8260	11/11/99 15:57	MP
SURR:DIBROMOFLUOROMETHANE	129	%	70-130	SW846-8260	11/11/99 15:57	MP
SURRITOLUENE-D8	119	%	70-190	SW846-8260	11/11/99 15:57	MP
SURR:BROMOFLUOROBENZENE	91	%	70-130	SW846-8260	11/11/99 15:57	MP
Application of the second seco		·				
Acenaphthene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Acenaphthylene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HW¢
Benzidine	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Benzo (a) anthracene	Not detected	ug/kg	410	SW846-B270	11/12/99 14:08	HWC
Benzo (a) pyrene	Not detected	ug/kg	410	SWB46-8270	11/12/99 14:08	HWC
Benzo (b) fluoranthene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Benzo (phi) perylene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Benzo (k) fluoranthene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Bis(2-chloroethoxy) methane	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWO
Bis(2-chloroethyl) ether	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWQ
Bis(2-chloroisopropyl) ether	Not detected	ug/kg	410	SW846-8270	11/12/99 14:0g	HWC
Bls(2-sthylhexyl) phthalate	(440)	ug/kg 🖔	70 410	SW846-8270	11/12/99 14:08	HWC
4-Bromophenyl phenyl ether	Not detected	ug/kg	410	SW845-8270	11/12/99 14:08	HWC
Butyl benzyl phthalate	Not detected	п д /kg	410	SW846-8270	11/12/99 14:08	HWC
2-Chloronaphthalene	Not detected	ng/kg	410	SW846-8270	11/12/99 14:08	HWC
4-Chlorophenyl phenyl ether	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Chrysene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
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11/19/99

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: SB-1

Prism Sample ID: AB47637

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

09:50 11:55

Lab Submittal Date/Time: 11/5/99

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
Dibenzo (a,h) anthracene	Not detected	ug/kg	410	SW845-8270	11/12/99 14:08	HWC
1,2-Dichlorobenzene	Not detected	ug/kģ	410	SW845-6270	11/12/99 14:08	HWC
1,3-Dichlorobenzene	Not detected	ug/kg	410	SW845-8270	11/12/99 14:08	HWC
1,4-Dichlorobenzene	Not detected	ug/kg	410	SW846-8270	11/12/89 14:08	HWC
3,3-Dichlorobenzidine	Not detected	ug/kg	41 D	SW846-B270	11/12/99 14:08	HW¢
Diethyl phthalate	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC '
Dimethyl phthalate	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Di-n-butyl phthalate	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
2,4-Dinitrotoluene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
2,6-Dinitrotoluene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC .
Di-n-octyl phthalate	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
1,2-Diphenylhydrazine	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Fluorathene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Fluorene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWD
Hexachlorobenzene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Hexachlorobutadiene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWÇ
Hexachlorocyclopentadiene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Hexachloroethane	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Indeno(1,2,3-cd) pyrene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Isophorone	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Naphthalene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Nitrobenzene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
N-nitrosodimethylamine	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWD
N-nitroso-di-n-propylamine	Not detected	ug/kg	410	SW846-8270	11/12/99 14:DB	HWD
N-nitrosodiphenylamine	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Phenanthrene	740	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Рутепе	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
1,2,4-Trichlorobenzene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC

11/19/99

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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: SE-1

Prism Sample ID: AB47637

11704 Reames Road

Login Group: 3591F5

Charlotte, NC 28269

Sample Collection Date/Time: 11/5/99

09:50

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

						
TEST	TEST			METHOD	DATE/TIME	
PARAMETER	RESULT	UNITS	MDL	REFERENCE	STARTED	ANALYST

Sample Comments:

Angela D. Overbash, V.P. Laboratory Services



11/19/99

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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: SB-2

11704 Reames Road

Prism Sample ID: AB47638

Login Group: 3591F5

Charlotte, NC 28269

Sample Collection Date/Time: 11/5/99

10:05

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
PREP, METHOD 3550	Completed				11/10/09 08:00	JDP
CALCULATIONS BASED ON DRY WT.	76	% DRY WT.	0.01	SM 2540 G	11/9/99 10:15	GAM
SW846 - 9071 TPH OIL AND GREASE	100	mg/kg 200	10	SW-846 #9071	11/9/99 11:30	LAC
BENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
BROMOBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
BROMOCHLOROMETHANE	Not detected	ug/kg	7.0	SW846-8260	11!11/99 16:45	MP
BROMODICHLOROMETHANE	Not detected	ug/kg	7.0	5W846-8260	11/11/99 16:45	MP
BROMOFORM	Not detected	ug/kg	7.0	SW846-826D	11/11/99 16:45	MP
BROMOMETHANE	Not detected	ug/kg	14.0	SW846-8260	11/11/99 16:45	MP
N-BUTYLBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
SEC-BUTYLBENZENE	Not detected	ນg/kg	7.0	SW846-8260	11/11/99 18:45	MP
TERT-BUTYLBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
CARBON TETRACHLORIDE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
CHLOROBENZENE	Not detected .	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
CHLORODIBROMOMETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
CHLOROETHANE	Not detected	ug/kg	14.0	SW846-8260	11/11/99 16:45	MP
CHLOROFORM	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
CHLOROMETHANE	Not detected	ug/kg	14.0	SW846-8250	11/11/99 16:45	MP
2-CHLOROTOLUENE	Nat detected	ug/kg	7.0	5W846-8260	11/11/99 16:45	MP
4-CHLOROTOLUENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MB
1,2-DIBROMO-3-CHLOROPROPANE	Not detected	ug/kg	14.0	SW846-8260	11/11/99 16:45	M
1,2-DIBROMOETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
DIBROMOMETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,2-DICHLOROBENZENE	Not datected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,3-DICHLOROBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,4-DICHLOROBENZENE	Not detected	ug/kg	7.0	SW846-8280	11/11/99 16:45	MP
DICHLORODIFLUOROMETHANE	Not detected	up/kg	7.0	SW845-8260	11/11/99 16:45	MP
1,1-DICHLOROETHANE	Not detected	up/kg	7.0	SW845-8260	11/11/99 16:45	MP
1,2-DICHLOROETHANE	Not detected	ng/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,1-DIOHLOROETHENE	Not detected	ng/kg	7.0	SW846-8260	11/11/99 16:45	MP



Full Service Analytical & Environmental Solutions

11/19/99

Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

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11:55

Customer Project ID: 99187

Customer Sample ID: SB-2

Prism Sample ID: AB47638

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99 10:05

Lab Submittal Date/Time: 11/5/99

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
CIS-1,2-DICHLOROETHENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
TRANS-1,2-DICHLOROETHENE	Not detected	ug/kg	7.0	SW846-6260	11/11/00 16:45	MP
1,2-DICHLOROPROPANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,3-DICHLOROPROPANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
2,2-DICHLOROPROPANE	Not detected	ид/кд	7.0	SW845-8260	11/11/99 16:45	MP
1,1-DICHLOROPROPENE	Not detected	ug/kg	7.0	SW846-8250	11/11/99 16:45	MP
ETHYLBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
HEXACHLOROBUTADIENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
ISOPROPYLBENZENE	Not detected	ug/kg	۵٫	SW846-8260	11/11/99 16:45	MP
P-ISOPROPYLTOLUENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
METHYLENE CHLORIDE	Not detected	ug/kg	140.0	SW846-8260	17/11/99 16:45	MP
NAPHTHALENE	Not detected	ug/kg	7.0	SW846-8260	11/11/98 16:45	MP
N-PROPYLBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
STYRENE	Not detected	ug/kg	7.0	SW846-B260	11/11/99 16:45	MP
1,1,1,2-TETHACHLOROETHANE	Not detected	มg/kg	7.0	SW846-8260	11/11/99 18:45	MP
1,1,2,2-TETRACHLOROETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MB
TETRACHLOROETHENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
TOLUENE	Not detected	ug/kg	7.0	SW846-8250	11/11/99 16:45	MP.
1,2,3-TRICHLOROBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,2,4-TRICHLOROBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,1,1-TRICHLOROETHANE	Not detected	na/ka	7.0	SW846-8260	11/11/99 16:45	MP
1,1,2-TRICHLOROETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP MP
TRICHLOROETHENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
TRICHLOROFLUOROMETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,2,3-TRICHLOROPROPANE	Not detacted	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1.2.4-TRIMETHYLBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1.3,5-TAIMETHYLBENZENE	Not detected	ug/kg	7.0	SW846-B260	11/11/89 16:45	MP
VINYL CHLORIDE	Not detected	ug/kg	14.0	SW846-8260	11/11/99 16:45	MP
TOTALXYLENES	Not detected	ug/kg	7.0	SW646-8260	11/11/99 16:45	MP
2-BUTANONE (MEK)	Not detected	ug/kg	70.0	SW846-8260	11/11/99 16:45	MP



11/19/99

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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: SB-2

11704 Reames Road

Prism Sample ID: AB47638

Charlotte, NC 28269

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

/5/99 10:05

11:55

Lab Submittal Date/Time: 11/5/99

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
2-CHLOROETHYL VINYL ETHER	Not detected	ug/kg	14.0	SW846-8260	11/11/99 16:45	MP
4-METHYL-2-PENTANONE (MIBK)	Not detected	ug/kg	70.0	SW846-8260	11/11/09 16:45	MP
ACETONE	Not detected	ug/kg	140.0	SW846-8260	11/11/99 16:45	MP
CARBON DISULFIDE	Not detected	ug/kg	140.0	SW846-8260	11/11/09 16:45	MP
VINYLACETATE	Not detected	ug/kg	70.0	SW845-8260	11/11/99 16:45	MP
CIS-1,3-DICHLOROPROPENE	Not detected	ug/kg	7. D	SW845-8260	11/11/99 16:45	MP
TRANS-1,3-DICHLOROPROPENE	Not detected	ug/kg	7.D	SW846-8260	17/11/99 16:45	MP
2-HEXANONE	Not detected	ug/kg	70.0	SW846-8260	11/11/99 18:45	MP
IPE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
MTBE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
SURR:DIBROMOFLUDROMETHANE	84	%	70-130	SW846-8260	71/11/99 16:45	MP
SURP:TOLUENE-DB	107	%	70-190	SW846-8260	11/11/99 16:45	MP
SURR:BROMOFLUOROBENZENE	106	%	70-130	SW846-8260	11/11/99 16:45	MP

Acenaphthene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Acenaphthylene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HMC
Benzidine	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HMC
Benzo (a) anthracene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Benzo (a) pyrene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Benzo (b) fluoranthene	Not detected	ug/kg	-430	SW846-8270	11/12/99 14:53	HWC
Benzo (ghl) perylena	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Benzo (k) fluoranthene	Not detected	пд/kg	430	SW846-8270	11/12/99 14:53	HWÇ
Bis(2-chioroethoxy) methane	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Bis(2-chloroethyl) ether	Not detected	ug/kg	430	'SW846-B270	11/12/99 14:53	HWC
Bis(2-chlorolsopropyl) ether	Not detected	ug/kg	430	SW846-B270	11/12/99 14:53	HWD
Bis(2-ethylhexyl) phthalata	Not detected	u g /kg	430	SW846-8270	11/12/99 14:53	HWC
4-Bromophanyi phenyl ether	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWO
Butyl benzyl phthalate	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
2-Chloronaphthalene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
4-Chiorophenyl phenyl ether	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Chrysona	Not detected	ug/kģ	430	SW846-8270	11/12/99 14:53	HWĆ



11/19/99

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: SB-2

Prism Sample ID: AB47638

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99 10:05

Lab Submittal Date/Time: 11/5/99 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS		MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
Dibenzo (a,h) anthracene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
1,2-Dichlorobenzene	Not detected	ug/kg		430	GWB46-8270	11/12/99 14:53	HWC
1,3-Dichlorobenzene	Not detected	ид/кд		430	SW846-8270	11/12/99 14:53	HWC
1,4-Dichlorobenzene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
3,3-Dichlorobenzidine	Not detected	ug/kg		430	SW846-6270	11/12/00 14:53	HWC
Disthyl phthalate	Not detected	ug/kg		430	SW846-8270	11/12/09 14:53	HWC
Dimethyl phthalate	Not detected	ug/kg		430	SW846-8270	11/12/09 14:59	HWC
Di-n-butyl phthalate	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
2,4-Dintrotoluene	Not detected	ug/kg		430	SW846-8270	11/12/09 14:53	HWC
2,6-Dinitrotoluene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Di-n-octyl phthalate	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
1,2-Diphenylhydrazine	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Fluorathene	1900	ug/kg	<	430	SW846-B270	11/12/99 14:53	HWO
Fluorene	Not detected	ug/kg	•	430	SW846-8270	11/12/99 14:53	HWC
Hexachlorobenzené	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Hexachlorobutadiene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Hexachlorocyclopentadiene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Hexachloroethane	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWO
Indeno(1,2,3-cd) pyrene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Isophorone	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Naphthalene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Nitrobenzene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
N-nitrosodimethylamine	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
N-nitroso-dl-n-propylamine	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
N-nitrosodiphenylamine	Not delected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC
Phenanthrene	1600	ug/kg	<	430	SW846-8270	11/12/99 14:53	HWO
Pyrane	840	ug/kg	شد	430	SW846-8270	11/12/99 14:53	HWC
1,2,4-Trichlorobenzene	Not detected	ug/kg		430	SW846-8270	11/12/99 14:53	HWC

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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: SB-2

Prism Sample ID: AB47638

11704 Reames Road Charlotte, NC 28269

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

10:05

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST	TEST			METHOD	DATE/TIME	
			•			
PARAMETER	RESULT	UNITS	MDL	REFERENCE	STARTED	ANALYST

Sample Comments:

Angela D. Overcash, V.P. Laboratory Services



Fu'il Service Analytical & Environmental Solutions

11/19/99

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: SB-3

Prism Sample ID: AB47639

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99 10:15

Lab Submittal Date/Time: 11/5/99 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
PREP. METHOD 3550	Completed				11/10/99 08:00	JDP
CALCULATIONS BASED ON DRY WT.	83	% DRY WT.	0.01	SM 2540 G	11/9/99 10:15	GAM
SW846 - 9071 TPH OIL AND GREASE	300	mg/kg 150	10	SW-846 #9071	11/9/99 11:30	LAC
BENZENE	Not detected	ນg/kg	6.0	SW846-8260	11/11/99 17:57	MP
BROMOBENZENE	Not detected	ug/kg	6.0	SWB46-8260	11/11/99 17:57	MP
BROMOCHLOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
BROMODICHLOROMETHANE	Not detected	ug/kg	6.0	SW848-8250	11/11/99 17:57	MP
BROMOFORM	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
BROMOMETHANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 17:57	MP
N-BUTYLBENZENE	Not detected	ug/kg	C.O	SW846-8260	11/11/99 17:57	MP
SEC-BUTYLBENZENÉ	Not detected	ug/kg	0.0	SW846-8260	11/11/99 17:57	MP
TERT-BUTYLBENZENE	Not detected	บg/kg	6.0	SW846-8260	11/11/99 17:57	MP
CARBON TETRACHLORIDE	Not detected	ид/кд	6.0	SW846-8260	11/11/99 17:57	MP
CHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
CHLORODIBROMOMETHANE	Not detected	ug/kg	6.0	SW846-B260	11/11/99 17:57	MP
CHLOROETHANE	Not detected	ug/kg	12.0	SW846-6260	11/11/99 17:57	MP
CHLOROFORM	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
CHLOROMETHANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 17:57	МР
2-CHLOROTOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
4-CHLOROTOLUENE	Not detected	ug/kg	6.0	SW846-8280	11/11/99 17:57	ME
1,2-DIBROMO-3-CHLOROPROPANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 17:57	MP
1,2-DIBROMOETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
DIBROMOMETHANE	Not detected	цд/кд	6.0	SW846-8260	11/11/99 17:57	MP
1,2-DICHLOROBENZENE	Not detected	ид/ко	6.0	SW846-8260	11/11/99 17:57	MP
1,3-DICHLOROBENZENE	Not detected	ид/кд	6.0	SW846-8260	11/11/99 17:57	MP
1,4-DICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
DICHLORODIFLUOROMETHANE	Not detected	ug/k g	6.0	SW846-8260	11/11/99 17:57	MP
1.1-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-B260	11/11/99 17:57	MP
1,2-DICHLOROETHANE	Not detected	ug/kg	6.0	SW845-B260	11/11/99 17:57	MP
1,1-DICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP



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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: SB-3

11704 Reames Road

Prism Sample ID: AB47639

Charlotte, NC 28269

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

10:15

Lab Submittal Date/Time: 11/5/99 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
CIS-1,2-DICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
TRANS-1,2-DICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/29 17:57	MP
1,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,5-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/09 17:57	MP
2,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	6W846-8260	11/11/99 17:57	MP
1,1-DICHLOROPHOPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/00 17:57	MP
ETHYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
HEXACHLOROBUTADIENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
ISOPROPYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
P-ISOPROPYLTOLUENE	Not detected	ug/kg	0.3	SW846-8260	11/11/99 17:57	MP
METHYLENE CHLORIDE	Not detected	ug/kg	120.0	SW845-8260	11/11/99 17:57	MP
NAPHTHALENE	Not detected	ug/kg	0.3	SW846-8260	11/11/99 17:57	MP
N-PROPYLBENZENE	Not detected	บg/kg	C.O	SW845-8260	11/11/99 17:57	MP
STYRENE	Not detected	ug/kg	0.3	SW846-8260	11/11/99 17:57	MP
1,1,1,2-TETRACHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,1,2,2-TETRACHLOROETHANE	Not detected	ц g/ kg	6.0	SW846-8260	11/11/99 17:57	MP,
TETRACHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
TOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,2,3-TRICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP.
1,2,4-TRICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/89 17:57	MP
1,1,1-TRICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,1,2-TRICHLOROETHANE	Not datected	ug/kg	6.0	SW846-8260	11/11/99 17:57	Wh
TRICHLOROETHENE	Not detected	ng/kg	6.0	SW845-B260	11/11/99 17:57	MP
TRICHLOROFLUOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,2,9-TRICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,2,4-TRIMETHYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,3,5-TRIMETHYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
VINYL CHLORIDE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 17:57	MP
TOTAL XYLENES	Not detected	ug/kg	0.8	.\$W846-8260	11/11/99 17:57	MP
2-BUTANONE (MEK)	Not detected	ug/kg	80.0	SW846-8260	11/11/09 17:57	MP



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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: SB-3

Prism Sample ID: AB47639

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

Lab Submittal Date/Time: 11/5/99

10:15 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
2-CHLOROETHYL VINYL ETHER .	Not detected	ug/kg	120	SW846-8260	11/11/00 17:57	MP
4-METHYL-2-PENTANONE (MIBK)	Not detected	ug/kg	60.0	SW846-8260	11/11/09 17:57	MP
ACETONE	Not detected	ug/kg	120.0	SW846-8260	11/11/99 17:57	MP
CARBON DISULFIDE	Not detected	ug/kg	120.0	SW546-8260	11/11/09 17:57	M₽
VINYL ACETATE	Not detected	ug/kg	60.0	SW846-8260	11/11/99 17:57	MP
CIS-1,9-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW845-8200	11/11/99 17:57	MP
TRANS-1,S-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
2-HEXANONE	Not detected	ug/kg	60.0	SW846-8260	11/11/09 17:57	MP
IPE	Not detected	ug/kg	Q.a	SW846-8260	11/11/99 17:57	MP
MTBE	Not detected	ນg/kg	6.0	SW846-8260	11/11/99 17:57	MP
SURP:DIBROMOFLUOROMETHANE	86	%	70-130	SW846-8260	11/11/99 17:57	MP
SURR:TOLUENE-D8	113	%	70-130	SW846-8260	11/11/99 17:57	MP
SURR:BROMOFLUOROBENZENE	119	%	70-130	SW846-8260	11/11/99 17:57	MP
				•		
Acenaphthene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Acenaphthylene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:18	HWO
Benzidine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWO
Benzo (a) anthracene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	аүн
Benzo (a) pyrenė	Not detected	ug/kg	2000	SW846-8270	11/12/89 17:16	HWC
Benzo (b) fluoranthene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Benzo (ghi) përylena	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Benzo (k) fluoranthens	Not detected	ug/kg	2000	SW845-8270	11/12/99 17:16	HWC
Bis(2-chlorosthoxy) methane	Not detected	ug/kg	2000	SW845-8270	11/12/99 17:18	HWC
Bis(2-chlorosthyl) ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Bis(2-chloroisopropyl) ether	Not detected	ug/kg	2000	SW846-8270	71/12/99 17:16	HWC
Bis(2-ethylhexyl) phthalate	3100	цg/kg <	> 2000	SW846-8270	11/12/99 17:16	HWC
4-Bromophenyi phenyi ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Butyl benzyl phthalate	Not detected :	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
2-Chloronaphthalene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
4-Chiorophenyl phenyl ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Chrysene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC

Lab Report



11/19/99

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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: SB-3

Prism Sample ID: AB47639

11704 Reames Road Charlotte, NC 28269

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

10:15

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
Dibenzo (a,h) anthracene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
1,2-Dichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
1,3-Dichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
1,4-Dichlorobenzane	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:18	HWC
3,3-Dichlorobenzidine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Diethyl phthalate	Not detected	ug/kg	2000	SW846-6270	11/12/99 17:16	HWC
Dimethyl phthalate	Not detected	ពសិ/ស្រ	2000	SW846-8270	11/12/99 17:16	HWC
Di-n-butyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/02 17:16	HWC
2,4-Dinitrotoluene	Not detected	ug/kg	2000	SW846-8270	11/12/00 17:16	HWC
2,6-Dinitrotaluene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Di-n-octyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
1,2-Diphenylhydrazine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Fluorathene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Fluorene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWO
Hexachlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWO
Hexachlorobutadiene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:15	HWO
Hexachlorocyclopentadiene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWD
Hexachloroethane	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWO
Indeno(1,2,3-cd) pyrene	Not detacted	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Isophorone	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Naphthalene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:18	HWO
Vitrobonzene	Not detected	ug/kg	.2000	SW646-8270	11/12/99 17:16	HWC
N-nitrosodimethylamine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWP
V-nitroso-di-n-propylamine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HŴC
V-nitrosodiphenylamine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Phenanthrone	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
yrene	Not detected	ug/kg	2000	SW845-8270	11/12/99 17:16	HWC
1,2,4-Trichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
•						•

11/19/99

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Geo-Environmental Consultants

Customer Project ID: 99167

Dave Stoner

Customer Sample ID: 58-3

11704 Reames Road

Prism Sample ID: AB47639

Charlotte, NC 28269

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

10:15

Lab Submittel Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST	TEST			METHOD	DATE/TIME	
1 243 1	(EG)			METROD	PALLE TO A BIANT	
PARAMETER	ひになりりて	1 1 177	1.01	REFERENCE	STARTED	ANTALLE
PARAMETER	RESULT	UNITS	MDL	MELENEIVOE	PINHIED	ANALYST

Sample Comments:

Analysis note for 8270: Sample MDL was raised due to final volume of sample extract.

Angela D. Overcash, V.P. Laboratory Services

Lab Report



11/19/99

Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

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10:36

Customer Project ID: 99187 Customer Sample ID: SB-4

Prism Sample ID: AB47640

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

Lab Submittal Date/Time: 11/5/99 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
PREP. METHOD 3550	Completed				11/10/99 08:00	JDP
CALCULATIONS BASED ON DRY WT.	7 9	% DRY WT.		SM 2540 G	11/9/99 10:16	GAM
SW846 - 9071 TPH OIL AND GREASE	260	mg/kg 250	10	SW-846 #9071	11/9/99 11:30	LAO
BENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
BROMOBENZENE	Not detected	ug/kg	a.ə	SW846-8260	11/11/99 18:39	MP
BROMOCHLOROMETHANE	Not detected	ug/kg	0.3	SW846-8260	11/11/99 18:39	MP
BROMODICHLOROMETHANE	Not detected	ug/kg	a.	SW846-8260	11/11/99 18:39	MP
BROMOFORM	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:99	MP ·
BROMOMETHANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 18:39	MP.
N-BUTYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
SEC-BUTYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
TERT-BUTYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:99	MP
CARBON TETRACHLORIDE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
CHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
CHLORODIBROMOMETHANE	Not detected	na/kā	6.0	SW846-8280	11/11/99 18:39	MP
CHLOROETHANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 18:39	MP
CHLOROFORM	Not detected	ц g/kg	6.0	SW846-8260	11/11/99 18:39	MP
CHLOROMETHANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 18:39	MP
2-CHLOROTOLUENE	(11)	ug/kg /	6.0	SW846-8260	11/11/99 18:39	MP
4-CHLOROTOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP MP
1,2-DIBROMO-3-CHLOROPROPANE	Not detected	ug/kg	12.0	SW845-8280	11/11/99 18:39	MP
1,2-DIBROMOETHANE .	Not detected	ug/kg	6.0	SW845-8260	11/11/99 18:39	MP
DIBROMOMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,2-DICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 16:39	MP
1,3-DICHLOROBENZENE	Not detected	ug/kg	6.0	SW845-8260	11/11/99 18:39	MP
1,4-DIOHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
DICHLORODIFLUOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:99	MP
1,7-DICHLOROETHANE	Not detected	ug/kg	6.0	SW845-8260	11/11/99 18:39	MP
1,2-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,1-DICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP

Lab Report



11/19/99

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Geo-Environmental Consultarits

Dave Stoner

11704 Reames Road

Charlotte, NC 25269

Customer Project ID: 99187
Customer Sample ID: SB-4

Prism Sample ID: AB47640

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99 10:36

Lab Submittal Date/Time: 11/5/99 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
CIS-1,2-DICHLOROETHENE	Not detected	ug/kg	6.0	SW646-8260	11/11/99 18:39	MP
TRANS-1,2-DICHLOROETHENE	Not detected	ug/kg	0.0	SW846-8260	11/11/99 18:39	MP
1,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:99	MP
1,3-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:99	MP
2,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,1-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 16:39	MP
ETHYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
HEXACHLOROBUTADIENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 16:39	MP
ISOPROPYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
P-ISOPROPYLTOLUENE	Not detected	ug/kg	6.0	SW846-8250	11/11/99 18:39	MP
METHYLENE CHLORIDE	Not detected	ug/kg	120.0	SW846-8280	11/11/99 18:39	MP
NAPHTHALENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
N-PROPYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:99	MP
STYRENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1.1.1.2-TETRACHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,1.2.2-TETRACHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
TETRACHLOROETHENE	Not detected	ug/kg	6.0	SW846-6260	11/11/99 18:39	MP
TOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,2,3.TRICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	.MR
1,2,4-TRICHLOROBENZENE	Not detected	ug/kg	0.0	SW845-B260	11/11/99 18:39	MP
1,1,1-TRICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,1,2-TRICHLOROETHANE	Not detected	ug/kg	6.0	SW846-B260	11/11/99 18:39	MP
TRICHLOROETHENE	Not detected	ug/kģ	6.0	SW846-8260	11/11/99 18:39	MP
TRICHLOROFLUOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,2,3-TRICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,2,4-TRIMETHYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,3,5-TRIMETHYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
VINYL CHLORIDE	Not detected	ug/kģ	12.0	SW846-8260	11/11/99 18:99	MP
TOTAL XYLENES	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
2-BUTANONE (MEK)	Not detected	na\ka	60.0	SW846-8260	11/11/99 18:39	MP

Full Service Analytical & Environmental Solutions

11/19/99

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: SB-4 Prism Sample ID: AB47640

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

10:36

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
2-CHLOROETHYL VINYL ETHER	Not detected	ug/kg	12.0	SW846-8260	11/11/99 18:39	MP
4-METHYL-2-PENTANONE (MIBK)	Not detected	ug/kg	60.0	SW846-8280	11/11/99 18:39	MP
ACETONE	Not detected	ug/kg	120.0	SW845-8260	11/11/99 18:30	MP
CARBON DISULFIDE	Not detected	ug/kg	120.0	SW846-6260	11/11/99 18:89	MP
VINYL ACETATE	Not detected	ug/kg	60.0	SW846-8260	11/11/99 18:39	MP
CIS-1,3-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
TRANS-1,3-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
2-HEXANONE	Not detected	ug/kg	60.0	SW846-8260	11/11/99 18:39	MP
PE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
MTBE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 16:39	MP
SURR:DIBROMOFLUOROMETHANE	93	%	70-130	SW846-8260	11/11/99 18:39	MP
SURR:TOLLIENE-D8	117	%	70-130	SW846-8260	11/11/99 18:39	MP
SURR:BROMOFLUOROBENZENE	103	. %	70-130	SW846-8260	11/11/99 18:38	MP
-						
Acenaphthene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01 .	HWC
Acenaphthylene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Benzidine	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Benzo (a) anthracene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Benzo (a) pyrene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Benzo (b) fluoranthene	Not detected	ug/kg	2100	SW845-8270	11/12/99 18:01	HWO
Benzo (ghi) penylene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWÇ
Benzo (k) fluoranthene	Not detected	ùg/kg	2100	SW846-8270	11/12/99 18:01	HWC
3ls(2-chloroethoxy) methane	Not detected	ug/kg	2100	SW846-B270	11/12/99 18:01	HWO
Sis(2-chloroethyl) ether	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWČ
3ls(2-chloroisopropyl) ether	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
3is(2-ethylhexyl) phthalate	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
-Bromophenyl phenyl ether	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Butyl benzyl phthalate	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
-Chloronaphthalene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
LChlorophenyl phenyl ether	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Chrysene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37735 - FL Certification N. E67519

449 Springbrook Road ... P.O. Box 240548 ... Charlotte, NC 28224-0543 Phone: 704/529-6364 - Toll Free Number: 1-800/529-6364 - Fax: 704/525-0409



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11/19/99

Customer Project ID: 99187

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Sample ID: SB-4

Prism Sample ID: AB47640

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

Lab Submittal Date/Time: 11/5/99

10:36 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST	TEST			METHOD	DATE/TIME	
PARAMETER	RESULT	UNITS	MDL	REFERENCE	STARTED	ANALYST
Dibenzo (a,h) anthracene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
1,2-Dichlorobenzene	Not detected	ug/kg	2100	SW84 6-827 0	11/12/99 18:01	HWC
1,3-Dichlorobenzane	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
1,4-Dichlorobenzene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
3,3-Dichlorobenzidine	Not detected	ug/kg	2100	SW846-8270	11/12/99 16:01	HWC
Diethyl phthalate	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Dimethyl phthalate	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWO
Di-n-butyl phthalate	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
2,4-Dinitratoluene	Not detected	ug/kg	2100	SW846-6270	11/12/99 18:01	HWQ
2.6-Dinitrotoluane	Not detected	ug/kg	2100	SW846-8270	11/12/99 1E:01	HWC
Di-n-octyl phthalate	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
1,2-Diphenylhydrazine	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Fluorattiene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWO
Fluorene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Haxachlorobenzené	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Hexachlorobutadiene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Haxachlorocyclopentadlene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Hexachloroethane	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Indono(1,2,9-cd) pyrene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Isophorone	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Naphthaleno	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Nitrobenzene	Not detected	ug/kg	2100	SW846-B270	11/12/99 18:01	HWO
N-nitrosodimethylamine	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
N-nitroso-di-n-propylamine	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
N-nitrocodiphenylamine	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Phenanthrene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Pyrene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
1,2,4-Trichlorobenzene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HMC
				1		

Lab Report



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11/19/99

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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

11704 Reames Road

Customer Sample ID: SB-4

Prism Sample ID: AB47640

Charlotte, NC 28269

Login Group: 3591F5

10:36

Sample Collection Date/Time: 11/5/99

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST	TEST			METHOD	DATE/TIME	
PARAMETER	RESULT	UNITS	MDL	REFERENCE	STARTED	ANALYST

Sample Comments:

Analysis note for 8270: Sample MDL raised due to final volume of sample extract.

Angela D. Overcash, V.P. Laboratory Services



Full Service Analytical & Environmental Solution

11/19/99

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: SB-5

Prism Sample ID: AB47641

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

10:48

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
PREP. METHOD 3550	Completed				11/10/99 08:00	JDP
CALCULATIONS BASED ON DRY WT.	84	% DRY WT.	רם.ם	SM 2540 G	11/9/99 10:15	GAM
SW846 - 9071 TPH OIL AND GREASE	300	mg/kg (J50	10	SW-846 #9071	11/8/99 11:30	LAC
BENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
BROMOBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
BROMOCHLOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
BROMODICHLOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
BROMOFORM	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
BROMOMETHANE	Not detected	սք/kg	12.0	SW846-8260	11/11/99 19:20	MP
N-BUTYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
SEC-BUTYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
TERT-BUTYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
CARBON TETRACHLORIDE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
CHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
CHLORODIBROMOMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
CHLOROETHANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 19:20	MP
CHLOROFORM	Not detected	ug/kg	6.0	SW846-8260	11/11/99 12:20	MP
CHLOROMETHANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 19:20	MP
2-CHLOROTOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
4-CHLOROTOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:20	MP
1,2-DIBROMO-3-CHLOROPROPANE	Not detected	ид/ка	12.0	SW846-8260	11/11/99 19:20	MP
1,2-DIBROMOETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
DIBROMOMETHANE	Not detected	ug/kg	6.0	SW846-8280	11/11/99 19:20	MP
1,2-DICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,3-DICHLOROBENZENE	Not detacted	ug/kg	- 6.0	SW846-8260	11/11/99 18:20	MP
1,4-DICHLOROBENZENE	Not detected	ug/k g	6.0	SW846-8260	11/11/99 19:20	MP
DICHLORODIFLUOROMETHANE	Not detected	ug/k g	6.0	SW846-8260	11/11/99 19:20	МP
1,1-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,2-DICHLOROETHANE	Not detected	ug/ka	6.0	SW846-8260	11/11/99 19:20	MP
1,1-DICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP

11/19/99

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Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: SB-5

Prism Sample ID: AB47641

Login Group: 3591F5

Sample Collection Date/Time: 11/5/89 10:48

Lab Submittal Date/Time: 11/5/99 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
CIS-1,2-DICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
TRANS-1,2-DICHLOROETHENE	Not detected	ug/kg	6.0	SW845-8260	11/11/99 19:20	MP
1,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	71/71/99 19:20	MP
1,9-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
2,2-DICHLOROPROPANE	Not detected	ug/kg	0.0	SW846-8260	11/11/99 19:20	MP
1,1-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
ETHYLBENZENE	Not detected	ug/kg	6.0	SW846-826D	11/11/99 19:20	MP
HEXACHLOROBUTADIENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP.
ISOPROPYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
P-ISOPROPYLTOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
METHYLENE CHLORIDE	Not detected	ug/kg	120.0	SW846-8260	11/11/99 19:20	MP
NAPHTHALENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
N-PROPYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
STYRENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,1,1,2-TETRACHLOROETHANE	Not detected	ug/kg	6.0	EW846-8260	11/11/99 19:20	MP
1,1,2,2-TETRACHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
TETRACHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
TOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,2,5-TRICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP.
1,2,4-TRICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	ME
1,1,1-TRICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,1,2-TRICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/09 19:20	MP
TRICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
TRICHLOROFLUOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,2,3-TRICHLOROPROPANE	Not detected	ug/kg	6.0	SW845-8260	11/11/99 19:20	MP
1,2,4-TRIMETHYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,3,5-TAIMETHYLBENZENE	Not detected	ug/kg	0.3	SW846-8260	11/11/99 18:20	MP
VINYL CHLORIDE	Not detected	ug/kg	120	6W846-8260	11/11/99 19:20	MP
TOTAL XYLENES	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
2-BUTANONE (MEK)	Not detected	ນ໘/kg	60.0	SW845-8260	11/11/99 19:20	MP

Full Service Analytical & Environmental Solutions

11/19/99

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10:48

Geo-Environmental Consultants

Dave Stoner

11704 Reames Road

Charlotte, NC 28269

Customer Project ID: 99187 Customer Sample ID: SB-5

Prism Sample ID: AB47641

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

Lab Submittal Date/Time: 11/5/99 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

•			· · · · · · · · · · · · · · · · · · ·				
TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANIAIVOT	
1 to seat Lett	AESUL1	UNITS	INT	HEFERENCE	_ O INTIED _	ANALYST	
2-CHLOROETHYL VINYL ETHER	Not detected	ug/kg	12.0	SW846-8260	11/11/99 19:20	MP	
4-METHYL-2-PENTANONE (MIBK)	Not detected	ug/kg	60.0	SW846-8260	11/11/99 19:20	MP	
ACETONE	Not detected	ug/kg	120.0	SW845-8260	11/11/99 19:20	MP	
CARBON DISULFIDE	Not detected	ug/kg	120.0	SW846-8260	11/11/99 19:20	MP	
VINYL ACETATE	Not detected	ug/kg	60.0	SW846-8260	11/11/99 19:20	MP	
CIS-1,3-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP	
TRANS-1,9-DICHLOROPHOPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP	
2-HEXANONE	Not detected	ug/kg	60.0	SW846-8250	11/11/89 18:20	MP	
IPE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:20	MP	
MTBE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP	
SURR: DIBROMOFLUOROMETHANE	94	%	70-130	SW846-8260	11/11/99 19:20	MP	
SURR:TOLUENE-DB	107	%	70-130	SW846-8260	11/11/99 19:20	MP	
SURR:BROMOFLUOROBENZENE	125	%	70-130	SW846-8260	11/11/99 19:20	MP	
				J			
Acenaphthene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	
Acenaphthylene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	
Benzidine	Not detacted	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	
Benzo (a) antimacene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	
Benzo (a) pyrene	Not detected	ug/kg	2000	SW846-B270	11/12/99 1B:46	HWC	
Benzo (b) fluoranthene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWO	
Benzo (ghl) perylene	Not detected	ug/kg	2000	SW846-B270	11/12/99 18:46	HWD	
Benzo (k) fluoranthene	Not detected	ug/kg	2000	SW846-B270	11/12/99 18:48	HWD	
Bis(2-chloroethoxy) methane	Not detected	- ug/kg	2000	SW846-8270	11/12/99 1 8:46	HWO	
Bis (2-chloroethyl) ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:48	HWC	
Bis(2-chloroisopropyl) ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWO	
· Bis(2-ethylhexyl) phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	
4-Bromophenyl phenyl ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	
Butyl benzyl phthelate	Not detected	ug/kg	2000	5W846-8270	11/12/99 18:46	HWC	
2-Chloronaphthalene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	
4-Chlorophenyl phenyl ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	
Chrysene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC	



11/19/99

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Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: SB-5

11704 Reames Road

Prism Sample ID: AB47641

Charlotte, NC 28269

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

10:48

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
Dibenzo (e,h) anthracene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
1,2-Dichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWO
1,3-Dichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
1,4-Dichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
3,3-Dichlorobenzidine	Not detected	ug/kg	2000	SW846-8270	11/12/99 16:46	HWC
Diethyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWD.
Dimethyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Di-n-butyl phthalate	Not detected	บg/kg	2000	SWB46-8270	11/12/99 18:46	HŴÇ
2,4-Dinitrotoluene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
2,6-Dinitratoluene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
DI-n-octyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
1,2-Diphenylhydrazine	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Fluorathene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Fluorene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Hexachlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:48	HWC
Hexechlorobutzdiene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Hexachlorocyclopentadlene	Not defected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Hexachloroethane	Not detected	ug/kg	2000	SW846-B270	11/12/99 18:46	HWC
ndeno(1,2,3-cd) pyrene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWE
Isophorone	Not detected	ug/kg	2000	SW846-8270	11/12/89 18:48	HWQ
Naphthalene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWO
Nitrobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
N-nitrosodimethylamine	Not detected	ug/kg	2000	SW848-8270	11/12/99 18:46	HWC
4-nitroso-di-n-propylamlne	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
N-nītresodiphenylamina	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Phenanthrene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Pyrene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
1.2.4-Trichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC



11/19/99

Page 25 of 25

Geo-Environmental Consultants

Customer Project ID: 99187

Dave Stoner

Customer Sample ID: SB-5

2270 (10/10/

Prism Sample ID: AB47641

11704 Reames Road Charlotte, NC 28269

Login Group: 3591F5

Sample Collection Date/Time: 11/5/99

10:48

Lab Submittal Date/Time: 11/5/99

11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST	TEST			METHOD	DATE/TIME	
PARAMETER	RESULT	UNITS	MDL	REFERENCE	STARTED	ANALYST

Sample Comments:

Anayleis note for 8270: Sample MDL raised due to final volume of sample extract.

Angela D. Overcash, V.P. Laboratory Services

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CHAIN OF CUSTODY RECORD

449 Springbrook Road A Charlotte, NC 28217

RECEIVED NOV 2 3 1999

11/19/99

Page 1 of 25

Geo-Environmental Consultants

Customer Project ID: 99187 Customer Sample ID: SB-1

Dave Stoner

Prism Sample ID: AB47637

11704 Reames Road

Login Group: 3591F5

Charlotte, NC 28269

Sample Collection Date/Time: 11/5/99

Lab Submittal Date/Time: 11/5/99

09:50 11:55

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
PREP. METHOD 3550	Completed				11/10/99 08:00	JDP
CALCULATIONS BASED ON DRY WT.	81	% DRY WT.	0.01	SM 2540 G	11/9/99 10:15	GAM
SW846 - 9071 TPH OIL AND GREASE	980	mg/kg	10	SW-846 #9071	11/9/99 11:30	LAC
BENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
BROMOBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
BROMOCHLOROMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
BROMODICHLOROMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
BROMOFÓRM	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
BROMOMETHANE	Not detected	ug/kg	124	SW845-8260	11/11/99 15:57	MP
N-BUTYLBENZENE	250	ug/kg	62	SW846-8260	11/11/99 15:57	MP
SEC-BUTYLBENZENE	170	ug/kg	62	SW846-8260	11/11 /9 9 15:57	MP
TERT-BUTYLBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
CARBON TETRACHLORIDE	Not detected	ug/kģ	62	SW846-8260	11/11/99 15:57	MP
CHLOROBENZENE	180	ug/kg	62	SW846-8260	11/11/99 1 5:57	MP
CHLORODIBROMOMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
CHLOROETHANE	Not detested	ug/kg	124	SWB46-8260	11/11/99 15:57	MP
CHLOROFORM	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
CHLOROMETHANE	Not detected	ug/kg	124	SW846-8260	11/11/99 15:57	MP
2-CHLOROTOLUENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
4-CHLOROTOLUENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2-D!BROMO-3-CHLOROPROPANE	Not detected	ug/kg	124	SW846-8260	11/11/99 15:57	MP
1,2-DIBROMOETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
DIBROMOMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2-DICHLOROBENZENÉ	Not detected	ug/kg	62	SW845-8260	11/11/99 15:57	MP
1,3-DICHLOROBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,4-DICHLOROBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
DICHLORODIFLUOROMETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,1-DICHLOROETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2-DICHLOROETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,1-DICHLOROETHENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP

STATE OF NORTH CAROLINA Department of Environment, Health, and Natural Resources 919 North Main St. Mooresville, N.C. 28115 (704)663-1699/ FAX 663-6040

Hazardous Waste Section File Access Record

Time/	Date	10/19/98		
Name		Woody Parkyn		
Repres	senting	The Tomlin G	ioup	
Guide	lines for A	ccess:		
availal these r	ble to the precords, and	fooresville Regional Office is ded ublic for review and copying. We I to carry out our day-to-day progesting this form:	also have the responsi	bility to the public, to safeguard
1.	Appoint Anyone	er that you call at least a day in ac ments will be scheduled between arriving without an appointment ion is available.	9:00 am and 4:00 pm.	Viewing time ends at 5:00 pm.
2.		st specify the files you want to rev t one time will be limited to five (The number of files that you m
3.	Access t is ten (1	y make copies of a file when the copt the copy machine may be limite 0) cents; payment may be made be should be made payable to the De	ed after 2:00 pm, due to by check, money order,	heavy staff use. Cost per copor cash at the reception desk.
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DIVISION OF WASTE MANAGEMENT



JANUARY 29, 1998

JAMES B. HUNT JR.

Mr. Daniel J. Bonanni

Director

WAYNE MCDEVITT Dana Transportation, Inc. SECRETARY

210 East Essex Ave.

Avenel, NJ 07001

WILLIAM L. MEYER DIRECTOR

RE: Dana Transport, Inc.

NCD074505850

RECEIVED S HAMASTE WASTE

Dear Mr. Bonanni:

On behalf of the Division of Waste Management, I acknowledge receipt of Dana Transport, Inc. check number 32187 in the amount \$ 3960.00 which represents the Secnd (2) of six (6) installments in accordance with the consent and settlement agreement herein.

Sincerely,

R/J. Edwards III

cc: Attorney General Central Files



Landon - F y I foro 2/25/17

210 EAST ESSEX AVE. AVENEL, N.J. 07001 (908) 750-9100 FAX (908) 750-1759 FAX (908) 636-7441

February 18, 1997

North Carolina Department of Environment, Health and Natural Resources ("DEHNR") Mr. Richard Bridgeman 919 North Main Street Mooresville, NC 28115

Re: NCGS143-215.1 (a)
Discharge of Wastewater
Dana Transport
7254 Mount Holly Road
Charlotte, NC
Mecklenburg County, NC

Dear Mr. Bridgeman:

The ensuing writing addresses areas-of-concerns ("AOC's") and corrective actions raised and requested in the Department's February 4, 1997 memorandum to the Corporation. In addition to the Department's inspection of the above-mentioned site on January 28, 1997, Mr. David Caldwell, Inspector, Mecklenburg County Environmental Protection, had inspected the aforesaid site on February 18, 1997 to determine storm water management and assess regulatory compliance measures exhibited on-site. The following is a listing of AOC's that require corrective action to be undertaken by the facility staff and the Corporation. The listing of AOC's is as follows:

A. AOC 1-Undertake closure operations with respect to above ground and underground storage tanks as well as addressing any contaminated soil or concrete associated with same as per North Carolina's environmental regulations. NOTE: Mr. Bob Jones, Engineer, Cooper Environmental, has been tasked to provide the Corporation with a closure proposal regarding the above-mentioned AOC's. Moreover, according to facility staff, the above-mentioned tanks have been out-of-service and said staff has been advised to drain all associated tanks and associated lines as well as addressing contaminated soil and containment tanks waters-oil/H2O sheen in holding tank.

B. AOC 2-Storage of on-site non-hazardous drums have accumulated in storage areas, namely, wash bay areas. NOTE: Corporate had dispatched a sealed, lined rolloff to the above-mentioned facility on or about February 1, 1997 to manage said drum containment and disposal. Furthermore, said rolloff, according to Corporate, will be maintained permanently at said facility for non-hazardous drum management. NOTE: Said rolloff has the capacity to contain approximately 70 drums of aqueous or slurry materials. Additionally, a steel plate will accompany the aforesaid rolloff as to permanent placement on concrete and positioned between said concrete and the rolloff to retain and preclude any rolloff residue from impacting storm water or associated earth. Moreover, spill materials will be housed in proximity to assist in the aforesaid residue collection.



Dana Transport, Inc Charlotte, NC Page Two

- AOC 2 Continued: With respect to on-site hazardous drum accumulation, facility staff have been advised to manage same in accordance with 40 CFR 262.34 as to on-site hazardous drum storage of less than 90 days. Furthermore, facility staff have been advised to provide visual/physical inspections of all facility containers/drums to detect leaks/spills and have been further instructed to annotate same in a provided daily log.
- C. AOC 3-On-site waste water trailer utilized as a storage tank/retention tank. As evidenced by Mr. Caldwell's on-site inspection, said trailer has been removed from service, drained and treated (waste water) by facility staff. Furthermore, facility staff have been advised to discontinue any further utilization of said trailer for on-site storage capacity. Moreover, facility staff and Corporate l'urchasing Director have been provided with purchasing quotes for an additional on-site 5306 gallon waste water treatment tank to assist in treatment and retention of facility wash bay waters.
- D. AOC 4-Mr. Caldwell, in the above-mentioned inspection, has requested that the facility apply for and gain a storm water management permit. Furthermore, as discussed in the aforesaid inspection, facility staff have been advised to perform monthly storm water management inspections to preclude industrial activities from associating with storm water events. Additionally, it was further agreed upon to provide Mr. Caldwell with a Best Management Practices Plan ("BMP") once said permit has been promulgated.
- E. AOC 5-Facility wash bay waters require containment from egressing facility. Facility staff and Corporate have been advised to construct permanent retention (i.e., concrete speed bumps) to retain exterior washing waters from egressing facility to concrete or earth. Facility staff have provided Corporate with construction bids for area concrete projects.
- F. AOC 6- Training, as requested by Mr. Caldwell, will continue as advised and undertaken on February 4, 1997 to train on the ensuing areas: spill prevention and notification, hazardous communication, confined space, contingency plan, evacuation plan, power shutoff, fall protection, lock out, tag out, waste management, personal protection equipment, fork lift operations and administrative requirements-inspections and log completion. NOTE: Mr. Hayes has undergone training on February 4, 1997 as in trainer-the trainer.
- G. AOC 7-Spill Abatement- According to facility staff, all contaminated soils have been excavated and retained in rolloffs awaiting analysis, Microbacs laboratory, analyzed February 4, 1997 for TPHC, BN, VOC's, Semi-VOC's, BTEX and TCLP-Metals. Approximately 125-150 cubic yards of contaminated soil have been excavated and retained for disposal. BFI has been consulted as to insitu remediation, if permits and sample results allow for same.



Dana Transport, Inc. Charlotte, NC Page Three

H. AOC 8-On-site water retention, namely, behind wash bay area collects surface waters and retains same. According to facility staff, construction quotes have been provided to Corporate Purchasing and Corporate to address surface area depressions. Furthermore, Mr. Jones, Cooper Environmental has been tasked to provide a proffer to Corporate Purchasing with respect to designing topography grading requirements and directed storm water management.

I. AOC 9-Housekeeping as an issue has been raised in both inspections. Facility staff have been advised as to appropriate housekeeping measures, i.e., heel collection policies, daily inspections, internal and external facility maintenance programs, etc.

This memorandum has been directed to Corporate (Mr. Dana) to assign milestone dates with respect to each AOC as well as those individuals identified as "copied" at the end of this memorandum. I am of the opinion, and it is my recommendation, that same should be undertaken and completed in a February-March time frame. It has been further advised that priorities should be considered and undertaken as to an immediate placement of an additional waste water storage tank, AST and UST closure, etc. With respect to the above-mentioned AOC's, facility staff have exhibited immediate corrective actions, specifically, on-site drum storage, housekeeping training, acquiring and providing quotes to Corporate Purchasing for equipment/construction.

Should you have any queries whatsoever, please do not hesitate to contact Mr. Robert Hayes, Mr. Bill Horvath at (704) 399-3395 or my office at (800) 733-3262 and Mr. Ronald B. Dana at the same telephone number.

Respectfully,

Daniel V. Bonanni Bromonom

Corporate Regulatory Affairs

Dana Corporation

djb:st wpncdehnr

c: Mr. Ronald B. Dana, CEO, Dana Corp.

Mr. Robert Partridge, Purchasing Director, Dana Corp.

Mr. Jackie Setliff, Regional Manager, Dana Corp.

Mr. Bill Horvath, Term. Mgr., Dana-Charlotte

Mr. Robert Hayes, Wash Bay Manager, Dana-Charlotte

Mr. David Caldwell, MCDEP, Inspections

Mr. Rusty Rozzelle, MCDEP

Mr. B. Keith Overcash, NCDEHNR

Mr. Robert Jones, Cooper Environmental

State of North Carolina Department of Environment, Health and Natural Resources Mooresville Regional Office

James B. Hunt, Jr., Governor Jonathan B. Howes, Secretary



February 15, 1996

Mr. Robert Hayes
Dana Transport, Inc.
7254 Mt. Holly Road
Charlotte, North Carolina 28214



Re: Compliance Order with Administrative Penalty

Dana Transport, Inc.

Docket # 97-000

NCD 074 505 850

Dear Mr. Robert Hayes:

Enclosed is a Compliance Order with Administrative Penalty (Compliance Order) issued to Dana Transport, Inc. for certain violations of the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 15A NCAC 13A (Rules). The Compliance Order describes both the violations at your facility and the actions required for compliance with the Act and Rules.

Pursuant to N.C.G.S. 130A-22(a), an administrative penalty of _____ is imposed in the Compliance Order. You may appeal this Compliance Order by filing a written petition for a contested case hearing with the Office of Administrative Hearings, P.O. Drawer 27447, Raleigh, North Carolina 27611-7447, within 30 days of receipt of the Compliance Order. For purposes of computing the time limit for filing a petition for a contested case hearing, the Compliance Order will be deemed received on the date it is received by Dana Transport, Inc.'s Registered Agent. A copy of the petition for a contested case hearing must also be served on Richard B. Whisnant, Process Agent for the Department of Environment, Health and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27604. The petition must be filed in accordance with N.C.G.S. 150B-23(a).

Please be advised that the Department of Environment, Health and Natural Resources, has implemented a department-wide policy to release all penalties that have been assessed against companies to the media. Therefore, the name of your company and the penalty amount that has been assessed against you will be released to the media.

If no administrative hearing is requested, the administrative penalty must be paid by Dana Transport, Inc. within 60 days of receipt of the Compliance Order by certified check or money order, payable to the Division of Solid Waste Management, and mailed to James A. Carter,



Section Chief, Hazardous Waste Section, Division of Solid Waste Management, P.O. Box 27687, Raleigh, North Carolina 27611-7687. If you desire to schedule an informal conference to discuss the Compliance Order, please contact R. Douglas Holyfield, Branch Head, Compliance Branch at (910) 771-4600.

Respectfully,

William L. Meyer, Director Division of Solid Waste Management

Enclosures: Compliance Order with Administrative Penalty

cc: Central File
Joseph Parker
Doug Holyfield
Keith Masters
Pat Williamson

Mecklenburg County Health Director

Diane Long

Attorney General Staff

Shannon Maher, EPA, Region IV

North Carolina Department of Environment, Health and Natural Resources Division of Solid Waste Management Hazardous Waste Section

In Re: Dana Transport, Inc.) COMPLIANCE ORDER WITH NCD 074 505 850) ADMINISTRATIVE PENALTY Docket # 97-000

PRELIMINARY STATEMENT

This Compliance Order with Administrative Penalty (the "Compliance Order") is issued under the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (the "Act"), and the North Carolina Hazardous Waste Management Rules, 15A NCAC 13A (the "Rules"). William L. Meyer, Director, Division of Solid Waste Management, Department of Environment, Health and Natural Resources, has been delegated the authority to implement the Act and Rules. Dana Transport, Inc. is located at 7254 Mt. Holly Road in Charlotte, Mecklenburg County, North Carolina. Based upon an inspection, the North Carolina Division of Solid Waste Management (the "Division") has determined that Dana Transport, Inc. is in violation of certain requirements of the Act and Rules as set forth in this Compliance Order.

STATEMENTS OF FACT AND LAW

- 1. On December 18, 1980, the Division was authorized to operate the State RCRA hazardous waste management program under the Act and Rules. William L. Meyer, Division Director, has been delegated those responsibilities.
- 2. Dana Transport, Inc. ("Dana Transport") generates hazardous waste as defined in N.C.G.S. 130A-290(8) and 15A NCAC 13A .0002, in Charlotte, Mecklenburg County, North Carolina. Dana Transport is a person as defined in N.C.G.S. 130A-290(22) and 15A NCAC 13A .0002.
- 3. 40 CFR Part 262, codified at 15A NCAC 13A .0007, contains standards and requirements applicable to generators of hazardous waste.
- 4. Dana Transport, Inc. is listed with the Division as a large quantity generator. A large quantity generator is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and 40 CFR 268.7(a)(4).

- 5. Dana Transport, Inc. is located on approximately two acres of land in Charlotte, in <u>Mecklenburg Co.</u>, North Carolina. Dana Transport, Inc. is a tank cleaning operation which generates D001 and D008 hazardous waste at its facility.
- January 28, 1997, Mr. Joseph Parker, Waste Management 6. Specialist with the Division and Mr. Jesse Wells, Waste Management Specialist with the Division conducted an inspection at Dana Transport, Inc. During the inspection, Mr. Joseph Parker conducted a paperwork audit, which included looking at all manifests generated since 1994. The audit revealed that D001 and (waste flammable and combustible liquid) wastes were generated at the facility. Both the D001 and D008 hazardous wastes are generated during the tank cleaning process. facility cleans large tanks, which are connected to tractor-trailers for over the road shipment. The facility cleans these tanks after they have been unloaded at their final destination. During the tank cleaning process, the heel of the tank is cleaned out first. The heel consists of the material residue from the product that was shipped in the tank. It is at this point that a hazardous waste or a non-hazardous waste is generated. Depending on the type of material that is cleaned out of the tanker, the facility either generates a hazardous waste or a non-hazardous This material is then containerized in fifty-five gallon containers and held for shipment to their designated TSDF.

During the inspection Mr. Joseph Parker noted that the facility was in violation of several requirements of 40 CFR 262, and other violations contained in 15A NCAC 13A specifically:

- A. 40 CFR 262.11, codified at 15A NCAC 13A .0007, states that a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:
 - a. He should first determine if the waste is excluded from regulation under 40 CFR 261.4 and 261.5.
 - b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.
 - c. If the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, he must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - (i) Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261 or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or

- (ii) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.
- d. If the waste is determined to be hazardous, the generator must refer to Parts 261, 264, 265, 266, 268 and 273 of this chapter for possible exclusions or restrictions pertaining to management of his specific waste.

Dana Transport, Inc. is in violation of 40 CFR 262.11, codified at 15A NCAC 13A .0007, in that it failed to determine if the waste generated is a hazardous waste. Specifically, the facility needs to perform a waste determination on two containers, holding material, that were observed during the inspection. The first fifty-five gallon container, noted in the Tank Washing Area as "degreaser" needs to be profiled and disposed of since the facility no longer uses this type of material in its operation. The second fifty-five gallon container was noted in the Tote Washing Area as being a trash drum. However, the material inside the container gave off a solvent type smell. This material needs to be properly characterized and disposed of accordingly.

B. 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0007, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and the generator complies with Subpart I of 40 CFR Part 265.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.174, codified at 15A NCAC 13A .0010 in that they failed to perform the required weekly inspection on containers of hazardous waste in storage.

C. 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0007, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0007 in that they failed to mark their containers holding hazardous waste with accumulation start dates. During the inspection, it was noted that twelve, fifty-five gallon containers, holding hazardous

waste, were not marked with an accumulation start date while in storage.

D. 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0007, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste onsite for 90 days or less without a permit or without having interim status, provided that while being accumulated onsite, each container and tank is labeled or marked clearly with the words, "Hazardous Waste".

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0007 in that they failed to label a container holding hazardous waste. During the inspection, it was noted that one, five gallon container, holding hazardous waste, was not labeled as a "Hazardous Waste".

- E. 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste onsite for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4).
 - 1. 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0010, states that facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with this program includes all the elements described in the document required under paragraph (d)(3) of this section.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0010, in that they failed to develop a training program for their employees on hazardous waste management.

2. 40 CFR 265.16(a)(2), codified at 15A NCAC 13A .0010, states that this program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced

at 40 CFR 265.16(a)(2), codified at 15A NCAC 13A .0010, in that they failed to retain a person trained in hazardous waste management procedures to perform routine training at the facility.

- 3. 40 CFR 265.16(a)(3), codified at 15A NCAC 13A .0010, states that at a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:
 - (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
 - (ii) Key parameters for automatic waste feed cut-off systems;
 - (iii) Communications or alarm systems;
 - (iv) Response to fires or explosions;
 - (v) Response to groundwater contamination incidents; and
 - (vi) Shutdown of operations.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.16(a)(3), codified at 15A NCAC 13A .0010, in that they failed to provide facility personnel with specific training in the area of emergency procedures in dealing with hazardous waste.

4. 40 CFR 265.16(c), codified at 15A NCAC 13A .0010, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.16(c), codified at 15A NCAC 13A .0010, in that they failed to provide facility personnel with an annual review of their initial hazardous waste training.

- 5. 40 CFR 265.16(d), codified at 15A NCAC 13A .0010, states that the owner or operator must maintain the following documents and records at the facility:
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
 - (2) A written job description for each position listed under paragraph (d)(1) of this section. This

description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

- (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section;
- (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, in that it accumulates hazardous waste on-site for 90 days or less without a permit or without having interim status, and it did not comply with the requirements for owners and operators in Section 265.16(d). Specifically:

- (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job, as required by 40 CFR 265.16(d)(1);
- (2) A written job description for each position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(2);
- (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d) (1) of this section, as required by 40 CFR 265.16(d) (3);
- (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel, as required by 40 CFR 265.16(d)(4).
- 6. 40 CFR 265.16(e), codified at 15A NCAC 13A .0010, states that training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years

from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.16(e), codified at 15A NCAC 13A .0010, in that they failed to retain current and past personnel training records at the facility.

7. 40 CFR 265.31 (Subpart C), codified at 15A NCAC 13A .0010, states facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.31 (Subpart C), codified at 15A NCAC 13A .0010, in that they failed to minimize the possibility of a release of a hazardous waste at their facility.

Specifically, during the inspection, a five gallon container holding hazardous waste was noted as having releases of hazardous waste on the sides of the container.

8. 40 CFR 265.35 (Subpart C), codified at 15A NCAC 13A .0010, states the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.35 (Subpart C), codified at 15A NCAC 13A .0010, in that they failed to provide sufficient amount of aisle space for containers of hazardous waste in storage.

Specifically, during the inspection, the inspector was unable to view containers holding hazardous waste due to the insufficient amount of aisle space provided by the facility in their storage area.

9. 40 CFR 265.53(b) (Subpart D), codified at 15A NCAC 13A .0010, states that a copy of the contingency plan and

all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.53(b)(Subpart D), codified at 15A NCAC 13A .0010, in that they failed to provide copies of the facility's revised contingency plan to the local police departments, fire departments, hospitals, and State and local emergency response teams.

Specifically, during a recent incident which involved a non-hazardous wastewater discharge, the information held by the local fire department was incorrect and not up to date. This information pertained to the emergency contacts for the facility.

- 10. 40 CFR 265.54(Subpart D), codified at 15A NCAC 13A .0010, states the contingency plan must be reviewed, and immediately amended, if necessary, whenever:
 - (c) The facility changes -- in its design, construction -- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
 - (d) The list of emergency coordinators changes.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, in that it accumulates hazardous waste on-site for 90 days or less without a permit or without having interim status, and it did not comply with the requirements for owners and operators in Section 265.54(Subpart D), codified at 15A NCAC 13A .0010. Specifically:

- The facility changes -- in its (c) construction -- in a way that materially increases the potential for fires, explosions, or releases hazardous waste or hazardous constituents, or changes the response necessary in required emergency, as by 40 CFR 265.54(c)(Subpart D);
- (d) The list of emergency coordinators changes, as required by 40 CFR 265.54(d)(Subpart D).

- F. 40 CFR 262.34(c)(1), codified at 15A NCAC 13A .0007, states that a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 261.33(e) in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he:
 - (i) Complies with Sections 265.171, 265.172, and 265.173(a) of this chapter; and
 - (ii) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Dana Transport, Inc. is in violation of 40 CFR 262.34(c)(1), codified at 15A NCAC 13A .0007, in that it accumulates hazardous waste on-site for 90 days or less without a permit or without having interim status, and it did not comply with the requirements for owners and operators in Section 262.34(c). Specifically:

(i) Complies with 40 CFR 265.171, codified at 15A NCAC 13A .0010, in that they failed to ensure that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Specifically, it was noted that one, fifty-five gallon container, holding hazardous waste, used for satellite accumulation, was observed to be open during the inspection. It was also noted that one, five gallon container, holding hazardous waste was observed to be open during the inspection.

(ii) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers, as required by 40 CFR 262.34(c)(1)(ii).

Specifically, it was noted that one, fifty-five gallon container, holding hazardous waste, used for satellite accumulation was not marked either with the words "Hazardous Waste" or with other words that identify the contents of the container. It was also noted that one, five gallon container, holding hazardous waste was not labeled as such.

G. 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0012,

states that generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or The five year record retention period is disposal. automatically extended during the course of unresolved enforcement action regarding the regulated activity or as requested by the Administrator. requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2-261.6, or exempted from Subtitle C regulation, subsequent to the point of generation.

Dana Transport, Inc. is in violation of 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0012, in that it did not retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

Specifically, Dana Transport, Inc. did not maintain Land Disposal Restriction notices for manifest document numbers 08296 dated 8/9/96 and 08396 dated 11/5/96.

ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$25,000.00 per day for each violation of the hazardous waste provisions of the Act, rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty which include the degree and extent of the harm caused by the violation and the cost of rectifying the damage. 15A NCAC 13A .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.

After careful co	onsideration of ea	ach of the factors	above, penalties
are assessed as	follows: A	; B; C	·; D
; E; F.	; and G.	;. Accord	ingly, a total
penalty is impos	sed in the amount	of	

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Dana Transport, Inc. is hereby ordered to take the following actions:

- 1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, payable to the Division, and mailed to James A. Carter, Section Chief, Hazardous Waste Section, Division of Solid Waste Management, P.O. Box 27687, Raleigh, North Carolina 27611-7687.
- 2. Dana Transport, Inc. shall by ______, or as otherwise indicated take the following actions to correct all violations as stated in this Compliance Order and otherwise be in compliance with 40 CFR 262, codified at 15A NCAC 13A .0007:
 - A. Comply with 40 CFR 262.11, codified at 15A NCAC 13A .0007. Dana Transport, Inc. shall determine if the material in two separate fifty-five gallon containers, noted during the inspection, is a hazardous waste.
 - B. Comply with 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.174, codified at 15A NCAC 13A .0010. Dana Transport, Inc. shall start performing required weekly inspections on containers of hazardous waste in storage.
 - C. Comply with 40 CFR 262.34(a)(2), codified at 15A NCAC 13A

- .0007. Dana Transport, Inc. shall clearly mark and make visible for inspection on each container, the date upon which each period of accumulation began.
- D. Comply with 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0007. Dana Transport, Inc. shall label or mark each hazardous waste container clearly with the words, "Hazardous Waste".
- E. Comply with 40 CFR 262.34(a) (4), codified at 15A NCAC 13A .0007. Dana Transport, Inc. shall comply with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a) (4). Specifically Dana Transport, Inc. shall:
 - 1. Develop a training program for their employees on hazardous waste management as required by 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0010.
 - 2. Ensure that the facility's training program is taught by a person trained in hazardous waste procedures which must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed as required by 40 CFR 265.16(a)(2), codified at 15A NCAC 13A .0010.
 - 3. Ensure that facility personnel is provided with specific training in the area of emergency procedures in dealing with hazardous waste as required by 40 CFR 265.16(a)(3), codified at 15A NCAC 13A .0010.
 - 4. Ensure that facility personnel is provided with an annual review of their initial hazardous waste training as required by 40 CFR 265.16(c), codified at 15A NCAC 13A .0010.
 - 5. Maintain the following documents and records at the facility, as required by 40 CFR 265.16(d), codified at 15A NCAC 13A .0010:
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job, as required by 40 CFR 265.16(d)(1);
 - (2) A written job description for each position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(2);

- (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(3);
- (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel, as required by 40 CFR 265.16(d)(4).
- 6. Ensure that the facility retains current and past personnel training records at the facility as required by 40 CFR 265.16(e), codified at 15A NCAC 13A .0010.
- 7. Ensure the facility is maintained and operated in such a way to minimize the possibility of a release of a hazardous waste as required by 40 CFR 265.31 (Subpart C), codified at 15A NCAC 13A .0010.
- 8. Ensure that a sufficient amount of aisle space is provided for containers of hazardous waste in storage as required by 40 CFR 265.35 (Subpart C), codified at 15A NCAC 13A .0010.
- 9. Ensure to provide copies of the facility's revised contingency plan to the local police departments, fire departments, hospitals, and State and local emergency response teams as required by 40 CFR 265.53(b) (Subpart D), codified at 15A NCAC 13A .0010.
- 10. Ensure that the following documents are amended at the facility, as required by 40 CFR 265.54(Subpart D), codified at 15A NCAC 13A .0010. Specifically:
 - (c) The facility changes -- in its design, construction -- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency, as required by 40 CFR 265.54(c)(Subpart D);
 - (d) The list of emergency coordinators changes, as required by 40 CFR 265.54(d) (Subpart D).
- F. Comply with 40 CFR 262.34(c)(1), codified at 15A NCAC 13A .0007, in that it accumulates hazardous waste on-site for 90 days or less without a permit or without having interim status, and it did not comply with the requirements for

owners and operators in Section 262.34(c). Specifically Dana Transport shall:

- (i) Ensure containers holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste as required by 40 CFR 265.171, codified at 15A NCAC 13A .0010.
- (ii) Ensure to marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers, as required by 40 CFR 262.34(c)(1)(ii).
- G. Comply with 40 CFR 268.7(a) (7), codified at 15A NCAC 13A .0012. Dana Transport, Inc. shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

Dana Transport, Inc. is hereby advised that, pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules constitutes a separate violation for which an additional penalty of up to \$25,000.00 per day may be imposed. If the violation(s) continues, Dana Transport, Inc. may also be subject to further enforcement, including injunction, to prohibit any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the Act and Rules.

NOTICE OF RIGHT TO APPEAL

Dana Transport, Inc. has the right to an appeal to contest any matter of law, material fact, requirement, or penalty set forth in this Compliance Order with Administrative Penalty. To appeal this Compliance Order, Dana Transport, Inc. must file a written petition for a contested case hearing with the Office of Administrative Hearings, P.O. Drawer 27447, Raleigh, North Carolina 27611-7447, within 30 days of receipt of the Compliance Order with Administrative Penalty. For purposes of computing the time limit for filing a petition for a contested case hearing, the Compliance Order will be deemed received on the date it is received by Dana Transport, Inc.'s registered agent. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to Richard B. Whisnant, Process Agent for the Department of Environment, Health and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27604.

The petition for a contested case hearing must be in accordance with N.C. Gen. Stat. 150B-23(a), and must state facts tending to establish that the Division has deprived Dana Transport of property, has ordered Dana Transport, Inc. to pay a fine or civil penalty, or has otherwise substantially prejudiced Dana Transport Inc.'s rights, and that the Division:

- Exceeded its authority or jurisdiction;
- Acted erroneously;
- Failed to use proper procedure;
- 4. Acted arbitrarily or capriciously; or
- 5. Failed to act as required by law or rule.

The petition must be signed by Dana Transport, Inc. or his representative and must be filed with a certificate of service stating that a copy of the petition was served on the Division through its process agent. The hearing will be conducted in accordance with Chapter 150B of the North Carolina General Statutes and the Rules of the Office of Administrative Hearings, a copy of which may be obtained from the Office of Administrative Hearings.

If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment, Health and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty.

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE ABC, OF THE NEED TO FILE A WRITTEN PETITION FOR A CONTESTED CASE HEARING WITH THE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 30 DAYS OF RECEIPT OF THIS COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY IF A HEARING IS DESIRED.

BY:_		
	William L. Meyer,	Director
	Division of Solid	Waste Management
DATE	•	

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order with Administrative Penalty to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, return receipt requested, postage prepaid) in an envelope addressed to:

Mr. Robert Hayes
Dana Transport, Inc.
7254 Mt. Holly Road
Charlotte, North Carolina 28214

Dated this, 19	96.
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William L. Meyer, Director Division of Solid Waste Management

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5. Received By: (Print Name) 6. Signature: (Addressee or Agent) PS Form 3811 December 1994	8. Addresses	95-6/5-7 e's Address (Only in paid)	Et L	I nank you
	■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we card to you. ■ Attach this form to the front of the mailpiece, or on the back if space permit. ■ Write "Return Receipt Requested" on the mailpiece below the article The Return Receipt will show to whom the article was delivered addivered. 3. Article Addressed to: MR ROBERT HAYES DANA TRANSPORT, INC. 7254 MOUNT HOLLY ROAD CHARLOTTE NC 28214 NCD 745505850 5. Received By: (Print Name)	■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered. 3. Article Addressed to: MR ROBERT HAYES DANA TRANSPORT, INC. 7254 MOUNT HOLLY ROAD CHARLOTTE NC 28214 NCD 745505850 5. Received By: (Print Name) 8. Addressee and fee is 6. Signature: (Addressee or Agent) X MARCON Addressee or Agent)	■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was relivered and the date delivered. 3. Article Addressed to: MR ROBERT HAYES DANA TRANSPORT, ING. 7254 MOUNT HOLLY ROAD CHARLOTTE NC 28214 NCD 745505850 5. Received By: (Print Name) 8. Addressee's Address (Only is and fee is paid) 6. Signature: (Addressee or Agent) X Man C Ballow is for a content to the following services following services following services following services following services extra fee): 1. □ Addressee 2. □ Restricte Consult postmas: 2. □ Restricte Tonsult postmas: 2. □ Restricte Tonsult postmas: 3. Article Number 4b. Service Type □ Registered □ Express Mail □ Return Receipt for Merchandise 7. Date of Delivery 5. Received By: (Print Name) 8. Addressee's Address (Only is and fee is paid)	■ Complete items 1 and/or 2 for additional services. © Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back it space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered. 3. Article Addressed to: MR ROBERT HAYES DANA TRANSPORT, ING. 7254 MOUNT HOLLY ROAD CHARLOTTE NC 28214 NCD 745505850 1 also wish to receive the following services (for an extra fee): 1. □ Addressee's Address 2. □ Restricted Delivery Consult postmaster for fee. 2. □ Restricted Delivery Consult postmaster for fee. 3. Article Addressed to: MR ROBERT HAYES DANA TRANSPORT, ING. 7254 MOUNT HOLLY ROAD CHARLOTTE NC 28214 NCD 745505850 8. Addressee's Address (Only if requested and fee is paid) 6. Signature: (Addressee or Agent) X MARCA Bullows Addressee or Agent)

lo Insurance Covera	ertified Mail age Provided.
Oo not use for Internation Sent to Mr. Robert	ational Mail <i>(See reverse</i> Hayes
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	te, NC 28214
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Return Receipt Showing Whom & Date Delivered	j to
Return Receipt Showing to V Date, & Addressee's Address	

RCRA INSPECTION REPORT

1. FACILITY INFORMATION Dana Transport, Inc.

7254 Mt. Holly Road

Charlotte, N.C. 28214 NCD 074505850 Generator

2. <u>FACILITY CONTACT</u> Robert Hayes - Container Manager

704-399-3395

3. <u>SURVEY PARTICIPANTS</u>

Joseph Parker - DEHNR, Hazardous Waste Section Jesse Wells - DEHNR, Hazardous Waste Section Bart Massey - Meck. Co. Hazardous Materials Division Robert Hayes - Dana Transport, Inc. Bill Horvath - Dana Transport, Inc.

4. <u>DATE OF INSPECTION</u> 28

28 Jan 1997

5. PURPOSE OF INSPECTION 265, & 268.

To determine compliance with 40 CFR 262,

6. FACILITY DESCRIPTION

Dana Transport, Inc. is listed with the State of North Carolina as a Large Quantity Generator of hazardous waste. The facility is located on Mt. Holly Road, near the Paw Creek area of Mecklenburg Co.

Dana Transport, Inc. operates as a tanker washing facility. They transport empty tankers into their facility and clean them out to be used again. In this process, the facility first cleans out the "heel" of the tank, which is placed into 55 gallon containers. Depending on the type of material transported in the tanker, the waste could be either hazardous and non-hazardous. After the "heel" is taken out, the inside of the tanker is then cleaned with a series of degreasers, soaps, and hot water. This wastewater material is then collected in a 5000 gallon tank located onsite. Once the this tank is full, it undergoes pretreatment before it is discharged to the CMUD (Charlotte - Mecklenburg Utilities Division). The facility employs mobile tanker to hold this wastewater when the pretreatment process is occuring. Acting as a temporary holding tank for the wastewater, the tanker allows the facility to continue normal operations during the treatment Any wastewater that is held in this tanker is pumped into the 5000 gallon batch tank after it is emptied. The pretreatment process of this wastewater consists of using Ferric chloride to The pretreatment produce a physical/chemical precipitation. When this is completed, the wastewater is sent to CMUD and the sludge material left over is sent to a sludge press which is located onsite. After going through the sludge press, this material is contained in a roll-off box and sent to BFI as a non-hazardous waste. A copy of the "Generator Waste Determination Certification" will be attached to this inspection report.

7. TYPE WASTE

D001 - Most of the types of hazardous waste this facility generates are manifested as ignitable.

D008 - The facility consistently ships off a D008 waste which is marked as Ethanol.

8. <u>AREAS OF INSPECTION</u>

(Yes = compliance, no = violation, na = not applicable)

- Emergency Preparedness:

In the area of emergency preparedness, the facility was not in compliance with two regulations. First, the facility failed to provide a sufficient amount of aisle space for containers of hazardous waste in storage. The regulations state that "The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Second, the facility uses five gallon buckets to transfer waste "heels" to containers marked as hazardous waste. During the inspection, it was noted that one, five gallon bucket, specified by Mr. Hayes as holding hazardous waste, was open and had noticeable (picture) releases on the outside of the container. The regulations state that "Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

- Inspection Records:

The facility conducts daily inspections on tanks and containers holding material onsite. However, these inspections were not addressing, at least on paper, requirements of hazardous waste inspections. The regulations clearly state that "The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

- Contingency Plan:

The facility's Contingency Plan was found to be out of compliance. No ammendments have been made to the plan as far as new facility personnel, changes in emergency coordinators, and changes in facility The regulations state that: "The contingency plan nust be reviewed, and immediately amended, if

necessary, whenever: (a) Applicable regulations are revised;

(b) The plan fails in an emergency;(c) The facility changes -- in its design, construction, operation, maintenance, or other circumstances -- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

(d) The list of emergency coordinators changes; or

(e) The list of emergency equipment changes."

In addition, local emergency agencies have not been notified of the changes at the facility. The regulations again clearly state that "A copy of the contingency plan and all revisions to the plan must be:
(a) Maintained at the facility; and
(b) Submitted to all local police departments, fire departments,

hospitals, and State and local emergency response teams that may be called upon to provide emergency services.
 - Training Records:

The facility's hazardous waste training was not in compliance with the requirements of the hazardous waste regulations. The training provided by the facility for employees focused mainly on facility operations. During the inspection, no documentation of training on subjects such as emergency procedures, use of emergency equipment, and hazardous waste regulations could be be provided by the facility. addition, the facility could not provide documentation of employee job titles and written job descriptions of those who fill positions that work with hazardous waste.

- Manifests/LDR:

The facility failed to retain the required land disposal

restriction forms for the following manifests:

1) Manifest Doc. # 08296 - 08/09/96

2) Manifest Doc. # 08396 - 11/05/96

In addition, the facility had no records of any hazardous waste shipments during the calendar year of 1995. It is the recommendation of the inspector that the generator investigate whether any shipments took place during this time.

- 90/180 day storage areas:

The facility has two areas where containers of hazardous waste are stored awaiting disposal. The first area was designated as the Tank Cleaning Area. During the inspection, it was observed that containers of hazardous waste and non-hazardous waste were stored together in this area (picture). With Mr. Hayes' assistance, five, fifty-five gallon containers were found to contain hazardous waste. Three of the containers were properly labeled and dated. The other two containers were not accessible to inspect due to the overcrowding of the other containers (picture). On the opposite side of the Tank Cleaning Area, the inspector observed one, fifty-five gallon container which was marked as a hazardous waste. However, the container did not have an accumulation start date marked on it. The regulations state that " The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container".

The other area, noted as the Tote Washing Area, also had containers of hazardous waste in storage. During the inspection, six, fifty-five gallon containers of hazardous waste were observed to be in storage. No accumulation start dates were marked on any of the containers (picture).

In addition, one, five gallon container was observed in the Tote Washing Area during the inspection. By Mr. Hayes' determination, this container held ink which is considered a hazardous waste by Dana

Transport. The container was open, not labeled as a hazardous waste, and had releases on the sides of the container (picture).

- Satellite Accumulation Area:

The facility's satellite accumulation area is located in the Tank Cleaning Area of the building. During the inspection, the inspector observed one, fifty-five gallon container being used to hold hazardous waste. The container was not marked as a hazardous waste and had to be identified as such by Mr. Hayes. The regulations state that must mark his containers either with the words "Hazardous Waste" or with other words that identify the containers of the containers (nicture) other words that identify the contents of the containers (picture).

In addition, the satellite accumulation container was observed to be open at the time of the inspection. The regulation state that "a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste (picture).

- External facility condition:

The following three observations were noted during the walk through portion of the inspection:

- 1) The facility had numerous empty containers stored on the property. Mr. Hayes told us that many of the containers were being held to be sold to a container recycler in the Charlotte area. Our recommendation was that he mark off a specific place on his property to store these containers in an orderly fashion.
- 2) Behind the facility, near thew pretreatment room, the facility has an aboveground tank that holds No. 2 fuel oil. A cinder block containment wall has been constructed around the tank. During the walk through, the inspector observed approximately 4 to 6 inches of material inside the containment. The material appeared to have yellowish/green coloration to it. It was also observed that around the base of the containment wall, on the outside, that this same yellowish/green coloration had stained the grass (picture). I have relayed this information to the Mecklenburg Co. Environmental Protection and State Division of Water Quality personnel to address this situation. The contacts made with the Mecklenburg Co. and State agencies are Mr. Steve Jadlocki and Mr. Landon Davidson, respectively.
- 3) Near the fore mentioned fuel oil tank, behind the facility, was an in-ground oil/water separator (picture). The inspector observed the unit to have black residues, assumed to be oil, on the ground surrounding the cover. This matter has also been referred to the above mentioned contacts for Mecklenburg Co. and the State of N.C.

- Other HW units:

The following items do not necessarily pertain to the title of other hazardous waste units, but are put here to addressed accordingly.

During the inspection, two containers were noted as needing waste determinations. The first, a fifty-five gallon container, was observed in the Tank Cleaning Area of the facility. The label above

the container specified that it held a type of degreaser (picture). Mr. Hayes said they no longer use this material and that it should sent off for disposal. When questioned about the type of material this container held, Mr. Hayes was unable to tell us whether it was hazardous or non-hazardous. The inspector informed Mr. Hayes that he would need to perform a waste determination on what this material was and have it disposed of accordingly.

The second container was found in the Tote Washing Area. The container in question was a fifty-five gallon container which held trash and other debris picked up from the washing area. The container was approximately 1/3 full and had solvent smell eminating from it (picture). Mr. Hayes informed us that no hazardous waste was supposed to be put in this container. The inspector informed Mr. Hayes that he will need to perform a waste determination on the contents of the container and have it disposed of accordingly.

- Recomendations: None

9. Waste Minimization

The facility failed to develop a written waste minimization plan for hazardous waste generation. The facility needs to develop this type of plan which specifies the steps Dana Transport, Inc. are taking to reduce their hazardous waste generation.

10. SITE DEFICIENCIES:

Facility not in compliance

The following violations were noted during the inspection:

1) 40 CFR 262.11 - Hazardous Waste Determination
The facility needs perform a waste determination on two containers
that were observed during the inspection. The first container, noted
in the Tank Washing Area as "degreaser" needs to be profiled and
disposed of since the facility no longer uses this type of material in
its operation.

The second fifty-five gallon container was noted in the Tote Washing Area as being a trash drum. However, the material inside the container gave off a solvent type smell. This material needs to be properly characterized and disposed of accordingly.

- 2) 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174 Weekly Inspections
 The facility needs to start performing weekly inspections on
 containers of hazardous waste in storage.
- 3) 40 CFR 262.34(a)(2) Accumulation Start Dates
 The facility needs to start marking all containers of hazardous
 waste in storage with accumulation start dates. Twelve, fifty-five
 gallon containers holding hazardous waste were noted during the

inspection as not having accumulation start dates marked on them.

- 4) 40 CFR 262.34(a)(3) Hazardous Waste Labels
 The facility needs to ensure that all containers of hazardous
 waste in storage are labeled with the words "Hazardous Waste". During
 the inspection, one five gallon container noted as holding hazardous
 waste was not labeled as a hazardous waste.
- 5) 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1)(2)(3) Personnel Training

The facility needs to have program of training that is specific to hazardous waste. The instructor for this program must be directed by a person trained in hazardous waste management regulations. The program should include, but not be limited to, contingency plan implementation, emergency procedures, and emergency equipment.

6) 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) - Personnel Training Annual

Review

Facility personnel must take part in an annual review of the required initial training.

- 7) 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(1)(2)(3)(4) Required Training Documents and Records
 The facility must maintain the following documents and records at the facility:
- (1) 40 CFR 265.16(d)(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job
- (2) 40 CFR 265.16(d)(2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.
- (3) 40 CFR 265.16(d)(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section.
- (4) 40 CFR 265.16(d)(4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.
- 8) 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(e) Past Training Records
 The facility must keep all training records on current personnel
 until closure of the facility. In addition, training records of
 former personnel must be kept onsite for three years from the date the
 employee last worked at the facility.

40 CFR 262.34(a)(4) ref. 40 CFR 265.31 - Releases of Hazardous Waste

The facility failed to minimize the possibility of a release of hazardous waste to the environment. During the inspection, one - five gallon container, holding hazardous waste, was noted as having releases on the sides of the container.

- 10) 40 CFR 262.34(a)(4) ref. 40 CFR 265.35 Required Aisle Space The facility failed to provide a sufficient amount of aisle space between hazardous waste containers in storage. During the inspection, both hazardous waste storage areas (Tank Cleaning Area and Tote Washing Area) were noted as not having any aisle space.
- 11) 40 CFR 262.34(a)(4) ref. 40 CFR 265.53(b) Copies of Contingency Plan

A copy of the facility's contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. During a recent incident which involved a non-hazardous wastewater discharge, the information held by the local fire department was incorrect and out dated. This information pertained to emergency contacts for the facility.

12) 40 CFR 262.34(a)(4) ref. 40 CFR 265.54(c)(d) - Amendment to Contingency Plan

The facility's contingency plan must be reviewed, and immediately

amended, if necessary, whenever the following occurs:

(c) The facility changes -- in its design, construction, operation, maintenance, or other circumstances -- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.

(d) The list of emergency coordinators changes.

During the inspection, inspectors reviewed the facility's contingency plan and noted that revisions have not been made to include the addition of the temporary tank used in the pretreatment process. The facility also failed to designate personnel as emergency The personnel named in the existing contingency plan as emergency coordinators no longer are employed at the facility. current facility contact was hired in April of 1996. We assume the facility has been conducting operations since last April without these revisions.

- 13) 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a) Open Containers The facility needs to ensure that all containers used for satellite accumulation are closed when not adding or removing waste. During the inspection, it was noted that one, fifty-five gallon container, used for satellite accumulation was observed open.
- 14) 40 CFR 262.34(c)(1)(ii) Container Labeling The facility needs to ensure that all containers used for satellite accumulation are marked with the words "Hazardous Waste" or

with other words that identify the contents of the containers. During the inspection, it was noted that one, fifty-five gallon container, used for satellite accumulation, was not marked as a hazardous waste.

15) 40 CFR 268.7(a) (7) - LDR Notification

As a generator of hazardous waste, the facility must retain a copy of all Land Disposal Restriction notices for at least five years from the date the waste was sent to their designated TSD. During the inspection, it was noted that the facility failed to retain the required LDR notices for Manifests: #08296 - 8/9/96, and #08396 - 11/5/96.

INSPECTOR	DATE	FACILITY CONTACT

1. Make Withless Endence list that coincides with compliance order.

PENALTY COMPUTATION CHECKLIST

Faci	lity Name/ID:	DANA TRANSPORT, 3	INC. NCD 074 505 850	
ADDR	ess: <u>7854</u>	MT. HOLLY ROAD, Ch	HARloHE, N.C. 28214	
1.	: Number of emp	ployees at the facil	lity. <u>/5</u>	
2.	Number of res	sidents in the area	of the facility.	
3.	Distance to	residents.		
4.	Source of fac	cility's potable was	ter supply. Amajopal water + Sewer	٤
5.	Source of pot industries in	table water supply for the area of the fa	for residents and/or other acility. Municipal	
6.	List all viol 40 CFR 262.11	lations found at the	e facility: 40 CFR 262 3Ha\a)ref.40 CFR 265.166d\3)
4	40CFR 26234(a)	(1)(i)ref. 40 cm 265.174	10 CFR 262.34(a)(4) ref. 40 CFR 265 16(d)(4)
4	10 CFR 262.34(a)(2) ef. 40 CFR	40 CFR 262.34 (4) (4) (FR 265.16 (e)	
4	40 CFR 262.34(a	1/(3)	40 CFR 262.34(a)(4) ref. 40 CFR 265.31	
4	40 <u>CFR 262.34(a)[</u>	4) ref. 40 CFR 265. 16(a)(1)	40 CFR 262.34(a)(4) ref. 40 CFR 265.35	
4	10 <u>CFR 262.34(s){4</u>	ref. 40 CFR 265,16/a/(z)	40 CFR 267.34(a)(4) ref. 40 CFR 265.53(b)	
		4) ref. 40CFR 265.16/0X3)	40 CF2 262.34(a)(4)-of.40 CFR 265.54(c)	١
40	10 CFR 262 34/9/4) ref. 40 CFR 765.16(c)	40 CFR 262.34(a)(4) ref. 40 CFR 265.54(d)	' .
40	O CFR 267.34(a)(4	1) ref. 40 CFR 265.16(d)(1)	1) 40 CFR 262,34(c)(1) ref. 40 CFR 265.171	1414.1
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40	CFR 262.34(a)(4	1) ref.40 CFR 265 16(d)(3	3) 40 CPC 266.7 CASC 12	
40	CFR 262.34(a)(y) ref. 40 Cpi 265.16(d)	X4)	

Perm	lation violated: 40 GFR 262.11	•
1.	Unit (8) involved. (2) Two fifty-five gallow Containers hold	Line italian land
2.	Type of waste (waste code and constituents)	DIM - ADSTILL
	HACANDOUS WASTE	
3.	Quantity of waste unknown - At most 110 galling of mate	110
4.	Describe area in which violation occured. (1) f. fly -	five asllow container
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	IN THE TOTE WASHING ARRA meted as bring wash in it hat incl	led of Solon A
5.	Specifics of violation. Sath Containers weed a was	te determination
_	done of the material contained inside.	
6.	Readily observable evidence indicating this violat	
	impacted the environment(e.g. discolored soil, odo	rs, etc.)
	Mone	
7.	Date violation occurred? JAN. 28 1997	
8.	Has facility been cited for this violation in past	2 VAG DO
٠.	Date(s) of past violation?	. Jes_ no_
		
		
Regu	lation violated: 40 CFR 262.34(a)(i)(i) ref. 40 CFR 74	5.174
1.	Unit (8) involved. About 12-55 gallow Confanor of H.W. mis	DRALE
2.	Type of waste (waste code and constituents) Door	0008
	i i	
3.	Quantity of waste Nove 12-55 gollon container of H.W. IN	stonage
4.	Describe area in which violation occured. Both the	TANK Cleaning
	Area and the Tota Washing Area	
-		1 1 1 1 1 1 1
5.	Specifics of violation. Facility failed to perform the religional on containers of Haz. Walte in Storage	quired weekly
6.	Readily observable evidence indicating this violat	lon may have
0.	impacted the environment (e.g. discolored soil, od	
	None None	JIB; ECC.
7.	Date violation occurred? JAN 28 1917	
8.	Has facility been cited for this violation in past	Yes_no_
	Date(s) of past violation?	
	<u> </u>	
_	1/2000 010 0 (/ 1/ 2)	
_	lation violated: 40 CFR 262.34 (4)(2)	
1.	Unit (B) involved. 12-55 gallow containers holding haz w	
2.	Type of waste (waste code and constituents) Door	N008
3.	Quantity of waste 12-55 44/100 containers	
4.		Lorrage Areas-
••	TANK Cleaning AREA and Tote washing AREA	HOICHER MINEUS -
	THE CHECKING AREA OF THE WASHING THEEL	
5.	Specifics of violation. Umardous whate confiners in	stonace where
	NOT MAKED WITH AN ACCUMULATION START DATE	
6.	Readily observable evidence indicating this violat:	on may have
	impacted the environment (e.g. discolored soil, ode	
	Pictures	
7.	Date violation occurred? JAN 28,1991	
8.	Has facility been cited for this violation in past	res_ no_
	Date(s) of past violation?	

	plation violated: 40 cm 262.34(q)(3)
	Unit(s) involved. 1-5 gAllow contained holding haradas waste
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3.	Quantity of waste 1-Scallon container Of harmons Wask
l .	Describe area in which violation occured. Jus 1-5 salled confa
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5.	Specifics of violation. Is sallow confained wat labeled as a
•	MAZARDONS WASTE
5.	Readily observable evidence indicating this violation may hav impacted the environment(e.g. discolored soil, odors, etc.) Ruture
١.	Date violation occurred? Jan 28 1999
3.	Has facility been cited for this violation in past? yes no_ Date(s) of past violation?
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2.	Type of waste (waste code and constituents) Door, Doos
١.	Quantity of waste
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•	impacted the environment (e.g. discolored soil, odors, etc.)
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	document.
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	Date violation occurred?
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2.	Type of waste (waste code and constituents) Dool, Doos
	Quantity of waste Describe area in which violation occured. PAPERWORK
•	Specifics of violation. FACILITY forled to list waither 100 descriptions for each position listed in the facilities NAZ WASTE MANAgement program
· •	Readily observable evidence indicating this violation may have impacted the environment(e.g. discolored soil, odors, etc.) No TRANNIC PACUMENT
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	Specifics of violation. No we Hen descriptions of the type and amount of both introductive and continuing that will be given to each person filling Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) AD TRAINING Document
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PURSONNEL FRAINI	no records at the facility	-1-1-1
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lation wielsted.	40 cm 262.34 (a) 4) ref. 40 0	FR 765 31
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Describe area in	n which violation occured. 🤟	We five gallow contain
WITS observed IN	the TOTE WAShING AREA	
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lation violated:	40 CFR 262.34 (a)(4) ref. 40	5 CFR 765. 35
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Type of waste (v	waste code and constituents)	DO01, D008
		_ <u>U</u>
Augustian of weat	te 12-55 gallow contacters	
	n which violation occured. 2	TWO AREAS - SIX CONTAI
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Describe area in M TANK (leaning Anga Specifics of vic	olation. FACULTY failed to provide	on sufficient amount
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	Init(s) involved. 1-55 gallor ranfamen med for sat. Accumulation 1-55 gallor ranfamen med for sat. Accumulation 1-55 gallor ranfamen med for sat. Accumulation 1-55 gallor ranfamen med for sat.			
Type of waste (waste code and constituents) Dool				
i	Quantity of waste LESS NAMN 55 GOINGS			
	Describe area in which violation occured. , The Safellite Accumulation			
-	area is located in the TANK Cleaning Area. The five gallow contained			
7	WAY located in the TOTE WASNING ANDE.			
	specifics of violation. Both contamens went obseived to be			
_	prod during the inspection.			
	Readily observable evidence indicating this violation may have			
	impacted the environment (e.g. discolored soil, odors, etc.)			
_	Pictures of both containers			
=				
	Date violation occurred? <u>JAN 28 1957</u>			
	Has facility been cited for this violation in past? yes no			
•	Ate(8) or past violation?			
_				
Lz	ition violated: 40 CFR 262.34(c)(1) ref. 40 CFR 262.34(c)(1)			
	Drit (8) involved. 1-35 sallow Consamer and 1-5 gallow Consamer			
7	Type of waste (waste code and constituents) Door			
3	Quantity of waste less than 35 sallors			
I	Describe area in which violation occured. The ONE-55 called contained.			
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	leadily observable evidence indicating this violation may have			
3	impacted the environment (e.g. discolored soil, odors, etc.)			
-	Pictures of both Continuens			
=	Nata mining and an analysis of the second and the s			
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	Date(s) of past violation?			
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2.	Type of waste (waste code and constituents)
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Violations

MANILESOS.

1) NO CDR Modifications for Manifest #\$ - \$ 08296 - 08/09/96 \$ 408396 - 11/5/96 40CFR 268, 7 (a) (7)

2) No Written WASte Minimization Plan

3) PNSPECTIONS
- NO WEEKLY INSPECTIONS ON CONFINERS of H.W.
40 CFR 265. 174

4 - No Documentation of Enspections 15 A NCAC 13A .00010 (i)

- 5) CONTINGENCY PLAN 40 CFR 265.50

 AMENOMIENT TO CONTINGENCY FOR NEW EMEN. COORD.

 WOT DONE 40 CFR ZGS.54 (L)(a)

 6) 40 CFR ZGS.55 NO Emerg. COOD. Appointed
- 3) 40 CER 765.56 Emerging Mocedines

 8) 40 CER 767.34 EMERGINGS ARANGEMENTS

JABINING RECORDS 9) 40 CER 265.16 FALILIA'S INAINING NOT IN ACCORDANCE WITH RCRA Regulations - No 1) Joh Titles 2) Writton Job descrip. 3) TRAINING DIRECTORS QUIALIS. 4) DESCRIPTION TONA TRAINING, 6) Document whom of Lasining Coven Covered Englection regulaments 40 Can 265, 15 (b) (1) - No Written schedule for Engrenting gil Monitoring Eguip, openhous and struct, Egne (such as dikes and sump primes most are important to preventing, detecting or responding to ENV. or human health harrids 11.) SATEllike Accumulation Aneas 2. Areas 1- JANK Cleaning Area - 1,55 gallow Confairer, over, No 1- Tota Cleaning Area - 1,3 gollow combainen, Releases of H.Wow side of continox, oren, No 4.W. Label (1) Sprake Anka 2 - Aneles 1- JANK Cleaning Area - 5 HD. Containers in stonage NO ALGLE SPACE Z- JOTE Area - 6-55 gollow containers in storage A) No Assespace B) No Accum Short Date

MEMO

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TO:	SUBJECT:

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ROWAN + Clenwood BACK (1:30

From: _____



North Carolina Department of Environment, Health, and Natural Resources

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DRUM #	FILL DATE	PRODUCT	WASTE CODE	PROFILE NUMBER
	11-19-96	to lette		
2	11-18-96	Acetore I to	iene	
X 3	11-25-96	Paper Blend Extender		:
4	11-25-96	<u> </u>		
5	11-25-96	ı t		
#6	12-17-96	Poly oil		l l
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- (c) The facility changes -- in its design, construction, operation, maintenance, or other circumstances -- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- (d) The list of emergency coordinators changes; or
- (e) The list of emergency equipment changes.

265.55 Emergency coordinator.

At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan.

[<u>Comment</u>: The emergency coordinator's responsibilities are more fully spelled out in Section 265.56. Applicable responsibilities for the emergency coordinator vary, depending on factors such as type and variety of waste(s) handled by the facility, and type and complexity of the facility.]

265.56 Emergency procedures

- (a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:
 - Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and
 - (2) Notify appropriate State or local agencies with designated response roles if their help is needed.
- (b) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and a real extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.
- (c) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).
- (d) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:
 - (1) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and
 - (2) He must immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under Part 1510 of this Title), or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:
 - (i) Name and telephone number of reporter:
 - (ii) Name and address of facility;
 - (iii) Time and type of incident (e.g., release, fire);
 - (iv) Name and quantity of material(s) involved, to the extent known;
 - (v) The extent of injuries, if any; and
 - (vi) The possible hazards to human health, or the environment, outside the facility.
- (e) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.
- (f) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(g) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

[Comment: Unless the owner or operator can demonstrate, in accordance with Section 261.3(c) or (d) of this chapter, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 265 of this chapter.]

- (h) The emergency coordinator must ensure that, in the affected area(s) of the facility:
 - (1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
 - (2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.
- (i) The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with paragraph (h) of this section before operations are resumed in the affected area(s) of the facility.
- (j) The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:
 - (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;
 - (3) Date, time, and type of incident (e.g., fire, explosion);
 - (4) Name and quantity of material(s) involved;(5) The extent of injuries, if any;

 - (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident.

aw well water Amy Lankin . Poben Puncey - Computer GIVE Mr. Myos A CAN IN the Morning Michelle Tre. Southern Devices 9.0. Down 68 Morgantin N.C. 28655 Employee - 12:34 called Police 5300 Batch Tank A 5000 Reason. Didn't Know How full the JANKEN WAS -CMND-BATCH TANK fennic whomas to head silten Sump S PONKEL

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"Davidson, Gilbert L." < n1eg434@mro.ehnr.state From: NC DEHNR Mooresville Regional Ofc. Organization: To: .IParker@mro.ehnr.state.nc.us Tue, 14 Jan 1997 10:04:37 +0500 ET Date sent: Subject: Metal disposal-Meck M.W. WASHOUSE **Priority:** normal Joe-Wanted to let you know that I rec. a CAP where soil was disposed of as Haz. Waste. They ran TCLP and everything appears on the up and up. I wasn't sure if you guys were supposed to be notified or not prior to disposal. C me for more details if necessary. Thanks Cherobia MINDAY Achermon ANDNIMME CAN - EMPLOYEE Would be fired Angine! - A Spill - world not make contact wit R.P. JANVIER - TEMPORAND Holding Used Motar Oil - 170 ft - to stream - Could see shains MNG 18 LENWY som sty- continuer pead of pads, Laustics, Gasolines, Diesel Regionsible party - Thered - had accused Monday Afternoon MUP PERMIT - NO BANT MASSEY - STATION - 399-4710 20 gallors Not connect

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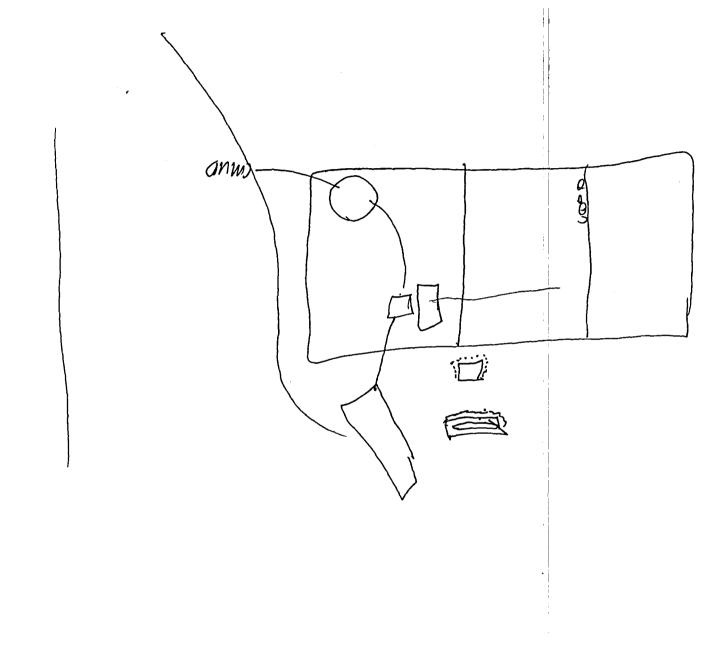
North Carolina Department of Environment, Health, and Natural Resources

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North Carolina Department of Environment, Health, and Natural Resources Printed on Recycled Paper



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9	3)	40 CFR 267.34 (9(4) 40CFR 265.31 Releases
1	4)	40 CFR 767.34 (a) (1)(i) 40 CFR 765.174 Ingression
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9	6)	40 CAR 262.84 (a) (4) 40 CFR 268.53 (b) Copies of Cons
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State of North Carolina Department of Environment, Health and Natural Resources Division of Solid Waste Management

James B. Hunt, Jr., Governor Jonathan B. Howes, Secretary William L. Meyer, Director

ROBERT HAYES, CONTAINER MGR DANA TRANSPORT INC 7254 MT HOLLY RD





July 30, 1996

RE EPA ID NO.: NCD074505850

Dear Sir/Madam:

CHARLOTTE, NC 28214

Based on information received by this office for the site identified with the EPA ID number, the state has accepted and processed the change in RCRA classification or information for the above site.

Please verify the computer generated information below and notify us of any corrections. We are advising EPA of the changes.

AUG 1996

RECEIVED

R. J. Edwards, Administrative Assistant Division of Waste Management

	/ indicates o	peration status of your	raomty.
_ EXEMPT S	NTY GENERATORTR	ORES EATER SPOSER	TRANSPORTER SMALL QTY BURNER USED OIL
	Company name:	DANA TRANSPOR	RT INC
	Owner:	RONALD B DANA	
	Contact:	HAYES ROBERT, CONTAINER 704/399-3395	
	Phone number:		
	Location address:	7254 MT HOLLY F	RD
	City, St & ZIP:	CHARLOTTE, NC	28214-
Please notify us	if there is any further chang	ge in your operation wh	ich would affect your status namely
Company's Nan	ne, Ownership, Address, Co	ntact or Telephone Nu	mber.

cc: ROBIN HEDDEN



Please refer to the Instructions for FIUID Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Pate Received (For Official Use Only)

JUL 22 1998

Linstellation's EPA ID Number (Mark X: In the appropriate box)		1
A. First Notification B. Subsequent Notification		
(Complete item C)	NCD074505	850
II. Name of installation (include company and specific site name	9) 3.25	
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III. Location of Installation (Physical address not P.O. Box or Ro	oute Number)	News are with the serving serving.
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Street (Continued)		
City or Town	State Zip Code	
	<u> </u>	
County Code County Name		
IV. Installation Mailing Address (See Instructions)	and the second s	
Street or P.O. Box		
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City of Town	State Zip Code	
V. installation Contact (Person to be contacted regarding was	to activities at site)	<u>ين مين .</u> .
Name (Last)	(First)	
HAYES	ROBERT	
Job Title	Phone Number (Area Code and Number)	
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VI. Installation Contact Address (See Instructions) A Contract Address B. Street or P.O. Box 7254MOUNT City or Town CHARLOTTE	704-399-339 H02LY RD State 7 Zip Code	5
VI. Installation Contact Address (See Instructions) A. Contract Address Location Making Date: B. Street or P.O. Box City or Town CITY OF Town VII. Ownership (See Instructions) A. Name of Installation's Legal Owner	704-399-339 H02LY RD State 7 Zip Code	5
VI. Installation Contact Address (See Instructions) A Contract Address B. Street or P.O. Box 7254MOUNT City or Town CHARLOTTE VII. Ownership (See Instructions)	704-399-339 HOLLY RD State Zip Code NC28214-	5
VI. Installation Contact Address (See Instructions) A Contract Address B. Street or P.O. Box City or Town CHARLOTTE VII. Ownership (See Instructions) A Name of Installation's Legal Owner RONALD B. DANA	704-399-339 HOLLY RD State Zip Code NC28214-	5
VI. Installation Contact Address (See Instructions) A Contract Address B. Street or P.O. Box 725 4 MOUNT City or Town CHARLOTTE VII. Ownership (See Instructions) A Name of Installation's Legal Owner RONALD B. DANA Street, P.O. Box, of Route Number	704-399-339 HOLLY RD State Zip Code NC28214-	5
VI. Installation Contact Address (See Instructions) A Contract Address Location Stalling Dense: B. Street or P.O. Box City of Town CHARLOTTE VII. Ownership (See Instructions) A-Name of Installation's Legal Owner RONALD B. DANA Street, P.O. Box, of Route Number P.O. BOX 9 6 2 City or Town City or Town	704-399-339 HOLLY RD State Zip Code NC28214-	5
VI. Installation Contact Address (See Instructions) A. Contract Address Location Stalling Dense: B. Street or P.O. Box City or Town CHARLOTTE VII. Ownership (See Instructions) A. Name of Installation's Legal Owner RONALDB BOX962 Street, P.O. Box, of Route Number P. D BOX962	704-399-339 H02LYRD State Zip Code NC28214- State Zip Code State Zip Code	5

		tructions)
A. Hazardou	s Waste Activity	B. Used Oil Recycling Activities
I. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (200-2,200 lbs.) c. Less than 100 kg/mo (220 lbs) Z. Transporter (Indicate Mode in boxes below) a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rail 3. Highway 4. Water 5. Other - specify	required for this activity; see instructions. 1-5	1. Used Oil Fuel Marketer a. Marketer Directs Shipment of Usec Dil to Off-Specification Burner b. Marketer Who First Claims the Use Oil Meets the Specifications 2. Used Oil Burner - Indicate Type(s) Combustion Device(s) a. Utility Boller b. Industrial Boller c. Industrial Furnace 3. Used Oil Transporter - Indicate Type(of Activity(les) a. Transporter b. Transfer Facility 4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(les) a. Process b. Re-refine
C. Description of Hazardous Wastes	(Use additional sheets if necessary)	
	rdous Wastes. (Mark 'X' in the boxes correspo liation handles; See 40 CFR Parts 261.20 - 261.24	
		7
Ignitable 2. Corrosive 3. Reactive (D001) (D002) (D003)	A Toxicity Characteristic (List specific EPA hazardous waste n	symber(s) for the Toxicity characteristic contaminant(
Listed Hazardous Wastes. (See 40	CFR 261.31 - 33; See Instructions If you need to I	list more than 12 waste codes.)
7 8 B	3 4 9 10	5
C. Other Wastes. (State or other wastes	requiring a handler to have an LD. number; See	instructions.)
		6 (Fig. 1)
C. Certification		
system designed to assure that qualified pe or persons who manage the system, or tho	iment and all attachments were prepared under m reconnel properly gather and evaluate the information se persons directly responsible for gathering the i rate, and complete. I am aware that there are signiful sonment for knowing violations.	on submitted. Based on my inquiry of the person information, the information submitted is, to t
Signature	Name and Official Title (Type or pr	rint) Date Signed
Robert 7 Hayes	Robert F Hayes Dana Container Mana	07/18/96
un laboriore autoriorio (del regionistra del		
G. Comments	Marie Ma	The state of the s
	•	•

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DEP (717) 787-4343

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION Bureau of Land Recycling and Waste Management

P.O. Box 8550 Harrisburg, PA 17105-8550 OFFICIAL PENNSYLVANIA MANIFEST FORM

Form approved.

OMB No. 2050-0039

Expires 9-30-96

	UNIFORM HAZARDOUS WASTE MANIFEST N C D 0 7 4 5 0	D	Manifest ocument No.	2. Pag of	7	Information wit required by Fe required by Sta	deral law		
	3. Generator's Name and Mailing Address			A. Sta	te Manifes	t Document Nu	mber	per per /	2
	Dana Container, Inc.				PA	E b.	LOI	155%	_
	7254 Mount Holly Road, Charlotte	, NC 28214	+	B. Stat	te Gen. ID				
	4. Generator's Phone (800) 796-3262				Same				
	5. Transporter 1 Company Name	6. US EPA ID Number	Jaget e Mad	C. Sta	te Trans, II	D	druga	Medical	rmoll
	Maumee Express, Inc. N J D	9 8 6 6 0 7	7 3 8	0 P	A-Al	0420)		
	7. Transporter 2 Company Name	8. US EPA ID Number	1 3 7 4 7 1	D. Trai	nsporter's	Phone (908	142	4-84	41
	and to be properly the contract of the second				te Trans. II				
	9. Designated Facility Name and Site Address	10. US EPA ID Number		P	A-Al-	-			
	Remtech Environmental Lewisberry	. Inc.			nsporter's)	MIT I	Tr vil
	550 Industrial Drive	peder who identified			te Facility'		-		
		6,7,0m9,8	8 2	0	ility's Pho	P2 4 P2	938-	-4700)
	2002300239 12 21332	7011020	1	ntainers	Inty 5 Pho	13.	14.	I.	
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	No	1 Tuna		Total	Unit	Wast	e No.
	a. RQ, Hazardous Waste Liquid, n.o.s., 9,	NASORO POTTI	No.	Туре		Quantity	100001	D03	0
	(Trichloroethylene, Tetrachloroethylene			1	Course		NE ASSE	D04	
		ERG#171)	-	n 34		2 2 0	0	P O	0 0
-			XX	4 D M	XX	4 4 0	0	ru	0 4
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N	(Ethanol, Varnish)	ma#100\	1 1	D M		E 0 E	-	D 0	0 1
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TO	pulse terror TCC 92 or Sunt a trade of AMAIC) remains of		delenen	mponds	200	131-	um	River	
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1	d.			10			8/		
	and the state of the second se			18		*	6		
				129	DE	G 1997	00		
	J. Additional Descriptions for Materials Listed Above Lab Pack Physical State DCSO10—A—SMM Lab Pack	Physical State		Kallandi	-	Toravastes Lis	ted Abou	e	
	1 1 7 7 7 7	to perfect y start in		13	2145	ARDOUS	C		
	a. Li L L L C.			ald	W	ARDUUQ	-		
	b. L.I DCSO10-B-FM1 d.	1 . 1		15	, "	NOTE.	WIET		
				b.	02010	d.			
	15. Special Handling Instructions and Additional Information a) (Carbowax, Le	itex /0-/5%, Sta	rch, car	bon ded	ment	20-25%, 1	richie	oroeth	7lene
	01%, Tetrachloroethylene 01%, Methylene Chloride	U-, 170, 2, 4-MARNAL	Minitro	coluene	U-0 1/09	HexachLor	robenz	ene U-	· 1/09
1	Hexachloro-1,3-Butadiene O1%, Speedi-dry O-10%) Al	50: 1053,10	22,110	20					
	13 47 1 00 WOW 11 1 10 100 TO 1 1 1 7 1000			000		l PO			
	b) (Ink 50-70%, Varnish 20-40%, Ethanol 5-40%)	Emergency Con	ntact J	-800-2	243-34	452			
	a constall a long a bridge of the Charles of the book of the cold of the	Plate#							
						Simple Service	100		
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of classified, packed, marked and labeled and are in all respects in proper condition for if I am a large quantity generator, I certify that I have a program in place to re	this consignment are fully	and accurate	ely described	d above by	y proper shippin	ng name	and are	9
	If I am a large quantity generator, I certify that I have a program in place to re practicable and that I have selected the practicable method of treatment, storage, or	educe the volume and tox	icity of waste	generated t	to the deg	ree I have dete	ermined t	to be econ	omically
	the environment; OR , if I am a small quantity generator, I have made a good faith to me and that I can afford.	effort to minimize my wast	e generation	and select th	ne best wa	aste manageme	ent meth	od that is a	available
	Printed/Typed Name	Signature	0	101			MONTH	DAY	YEAR
T	James E. Adams	Tumes	(Uld	an	na 1	121	101	47
Т	17. Transporter 1 Acknowledgement of Receipt of Materials		No. of Contract of	7					
RANSPORTER	Printed/Typed Name	Signature	11-	Las			MONTH	DAY	YEAR
SP	18 Transporter 2 Advantagement (1)	Who t	V X		1		1 2	10	7/
OR	18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name	Signature			11	-	MONTH	DAY	YEAR
ER						1	1	7-7-1	Harris
	19. Discrepancy Indication Space	CHANGE TOWN		100			170		
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1					- 11		No. of Control of Control	The same	100
L	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by		oted in item 1	9.			101/2		VE 45
T	Printed/Typed Name	Signature					MONTH	DAY	YEAR
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INSTRUCTIONS FOR COMPLETION OF THE PENNSYLVANIA HAZARDOUS WASTE MANIFEST

No reproduction of this official Pennsylvania manifest form may be used as a shipping document for shipment of hazardous waste. All copies of this manifest must be legible.

GENERAL INFORMATION

For all shipments of hazardous waste. The copies of the manifest shall be distributed as indicated at the bottom of each copy. AM ETEAW

If there are more than four different waste streams in a shipment, except for lab packs, complete another Manifest. If there are more than two transporters or if the waste is a lab pack, use the Uniform Hazardous Waste Manifest Continuation Sheet. Continuation Sheets must be purchased commercially, If you have any questions concerning the completion of this Manifest, call 717-783-9258.

- Generator/Shipper's US EPA ID No. Enter the twelve digit US EPA Identification Number. Manifest Document No. Assign a five digit number Item 1. unique to all others assigned by this Generator/Shipper.
- Page 1 of ___ Enter the total number of pages used to complete this Manifest counting this Manifest and Continuation Sheets, if any. Item 2
- Generator/Shipper's Name and Mailing Address Enter the complete name of the generator/shipper and the complete mailing address. The Item 3. address should be the location that will manage the returned Manifest forms.
- State Manifest Document Number This number is pre-printed, do not alter it. This Number must be placed in Item L of each continuation sheet. Item A
- Item B. State Gen ID - Not required for PA Generators.
- Generator's Phone Number Enter the area code and telephone number where an authorized agent of the Generator may be contacted. item 4.
- Transporter 1 Company Name Enter the complete company name of the first Transporter who will transport the waste. Item 5.
- Use EPA ID Number Enter the twelve digit US EPA Identification Number of the Transporter identified in Item 5. Item 6.
- State Trans. ID Enter the four digits of the License No. issued by PA DEP. Item C.
- Item D. Transporter's Phone - Enter the area code and the telephone number where an authorized agent of the Transporter may be contacted.
- Transporter 2 Company If applicable, see item 5. Item 7.
- US EPA ID Number If applicable, see Item 6. Item 8.
- Item E. State Trans. ID - If applicable, see Item C.
- Item F. Transporter's Phone - If applicable, see Item D.
- Designated Facility Name and Site Address Enter the complete company name and complete site address of the facility designated to receive the Item 9. waste listed on this Manifest. The address must be the site address, which may differ from the mailing address. The address must be the site address, which may differ from the mailing address.
- Item 10. US EPA ID Number - Enter the twelve digit US EPA Identification Number of the Designated Facility.
- Item G. Enter the Facility's State ID Number - Not Required for PA facilities.
- Item H. Facility's Phone - Enter the area code and phone number where an authorized agent of the Designated Facility may be contacted.
- US DOT Description Including Proper Shipping Name, Hazard Class, and ID Number (UN/NA Number)] Enter the US DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA Number) for each waste as identified in 49 CFR 171 through 177. For wastes not regulated as Item 11. hazardous materials by DOT, enter a description of the waste. List DOT Hazardous Materials first.
- Item 12. Containers (No. and the period of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.
- Item 13.
- Total Quantity Enter the letal quantity of each waste. Do not use decimals or fractions.

 Unit (Wt/Vol) Enter the appropriate appreciation from Table II (below) for the unit of measure. Item 14.

Table I - Types of Containers

- DM = Metal drums, barrels, kegs
- DW = Wooden drums, barrels, kegs
- DF = Fiberboard or plastic drums,
- = Tanks portable
- = Cargo tanks (tank trucks) TC = Tank cars
- DT = Dump truck
- CY = Cylinders
 - P = Pounds

- CM = Metal boxes, cartons, cases T = Tons (2000 lbs) M = Metric tons (1000 kg) (roll-offs, hoppers, gondolas, etc.) Y = Cubic yards N = Cubic Meters

 CW = Wooden boxes, cartons, cases, pallets
- CF = Fiber or plastic boxes, cartons, cases, pallets
- BA = Burlap, cloth, paper or plastic bags
- Waste No. Enter the Hazardous Waste Number of each waste. Refer to the Department's Regulations for Hazardous Waste Nos. If a waste is not Item I. regulated in PA but is regulated by another State, enter that State's waste code. Also, enter in item J or Item 15, "This waste is not a Hazardous Waste according to PA law."

Table II - Units of Measure

L = Liters (liquids only) K = Kilograms

G = Gallons (liquid only)

- Item J. Additional Descriptions for Materials Listed Above - Check the designated box if the waste is a Lab Pack. Enter the physical state of each waste
- Item K. Handling Codes for Wastes Listed Above - Not required for PA Generators.
- Special Handling Instructions and Additional Information Use this space to indicate special transportation, treatment, storage, or disposal Item 15. information or Bill of Lading information. For international shipments, enter the point of departure (City and State). If the waste will be recycled at the designated facility on this manifest, enter a statement to that effect.
- Generator/Shipper's Certification Read and sign by hand the certification statement. Enter the date (MM/DD/YY) the waste was shipped. If a Item 16. mode other than highway was used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode in addition to the highway mode is used, enter the appropriate mode (e.g., and rail) in the space below the certification statement. Primary exporters shipping hazardous waste to a facility located outside the United States must add to the end of the first sentence of the certification the following words "and conforms to the terms of the EPA Acknowledgement of Consent to the shipment."

TRANSPORTER

- Item 17. Transporter 1 Acknowledgement of Receipt of Materials - Print or type the name of the person accepting the waste on behalf of the transporter. Sign and enter the date of receipt (MM/DD/YY).
- Item 18. Transporter 2 Acknowledgement of Materials - If applicable, see Item 17.

DESIGNATED FACILITY

- Item 19. Discrepancy Indication Space The Designated Facility's authorized representative must note in this space any significant discrepancy between the waste types or quantities described on the Manifest and those actually received. If waste is rejected, so indicate in this space.
- Facility Owner or Operator. Certification of receipt or rejection of hazardous materials covered by this manifest. Print or type the name of the person accepting or rejecting the waste on behalf of the owner or operator of the facility. Sign and enter the date of the receipt or rejection

2-TSD MAIL TO- GENERATOR STATE



State of New Jersey
Department of Environmental Protection
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421



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			399-33									
		rtar 1 Company Name	1,	333	6. US	EPA ID Number		C. State	Trans. ID-NJD	EP	8103	16
111	STA	Ate tower 1	VAC		NNDO	0002	2193		Decal	No	8693	3
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11. U	S DOT	Description (Including Prop ID Number and			class or Division,		12. Cont		13. Total	14. Unit	l. Waste No.	
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GENERAL INFORMATION

The Hazardous Waste manifest is designed to track waste from the point of generation to final disposal (cradle to grave). In order to accomplish this goal, it is essential that all items on the manifest be completed correctly, incomplete, incorrect or illegible manifests are violations of

INSTRUCTIONS-IMPORTANT: READ ALL INSTRUCTIONS BEFORE COMPLETING

The New Jersey manifest contains 8 copies. ALL COPIES MUST BE LEGIBLE. This form

DESTINATION STATE-TSDF must mail original to the state regulatory agency

GENERATOR STATE-The TSDF mails this copy back to the state regulatory

TRANSPORTER COPY—The transporter keeps this copy for his records

NOTE: If a continuing transporter is used the generator is responsible for supplying him with a legible photocopy, which must contain required signatures.

DESTINATION STATE-The generator mails this copy to the state regulatory

GENERATOR COPY-The generator keeps this copy for his records.

MANIFEST FORM ACQUISITION

If the destination (consignment) state supplies a manifest a requires its use, then the generator is obligated to obtain the manifest from that state.

If the destination state does not supply the manifest, but the generator state does, then the generator is obligated to obtain the manifest form from the generator state.

GENERATOR SECTION

GENERATOR SECTION

GENERATOR'S EPA ID NO.-MANIFEST DOCUMENT NO.-Enter the generator's EPA identification number. The manifest document number is a unique 5-digit number the generator assigns to each manifest, for his recordkeeping purposes.

GENERATOR'S NAME & MAILING ADDRESS—Enter the name (as notified to EPA) & mailing address of the generator. The address should be the location that will manage the returned manifest forms.

GENERATOR'S PHONE NUMBER-Enter a telephone number with area code

EPA) of the first transporter who will transport the waste.
US EPA ID NUMBER-Enter the EPA identification number of the first

transporter identified in item 5.
TRANSPORTER 2 COMPANY NAME—If applicable, enter the company name (as notified to EPA) of the second transporter who will transport the waste, if more than two (2) transporters will be used, use a continuation sheet and list the transporters in the order they will be transporting the waste.

US EPA ID NUMBER-If a second transporter is used, enter the EPA

EPA ID NUMBER-Enter the EPA identification number of the designated TSDF

USDOT regional office.

CONTAINERS (NO. & TYPE)—Enter the number of containers for each waste and the appropriate abbreviations from Table 1 (below) for the type of container

TOTAL QUANTITY—Enter the total quantity of waste described on each line. DO NOT USE FRACTIONS
UNIT (Wt_Vol.)—Enter the appropriate abbreviation from Table III (below) for the unit of measure used in determining the total quantity of waste described one

TABLE II UNITS OF MEASURE

SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATON-

Use this space to indicate special transportation, treatment, storage, disposal, or Bill of Lading Information, if any. If an alternate facility is designated, note there. For INTERNATIONAL SHIPMENTS, generators must enter the point of departure (city 8 state) in this space. This space may also be used for emergency response telephone numbers, and any other information the generator is required to include about the shipment in accordance with 49 CFR Part 172, Subpart G as applicable for RCRA hazardous waste and USDOT hazardous materials.

hazardous materials.

GENEFATOR'S CERTIFICATION—The Generator must read, sign (by hand) and date the certification. This must be done the day the transporter picks up the waste shipment (date of receipt by transporter). If a mode other than highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, air) inserted in the space. If another mode in addition to the highway mode is used, either the appropriate additional mode (e.g. "and rail") in this space.

space.

STATE MANIFEST DOCUMENT NUMBER—Number preprinted by New Jersey except on the continuation sheets. Enter this number on each continuation sheet attached to a manifest.

STATE GEN ID—The State Generator ID is the street address of the waste generation site. If the mailing address and the site address are the same, enter "same".

STATE GEN ID—The State Generator ID is the street address of the weste generation site. If the mailing address and the site address are the same, enter same.

STATE TRAN #1 ID—Enter the New Jersey state permit number. This must include both the transporter's permit number and the decal number of the hazardous waste transport unit of inszardous waste vehicle which contains the waste. For rail shipment(s) enter the alpha numeric ID. number assigned to the railcar in lieu of the decal number.

TRANSPORTER PHONE—Enter a telephone number with area code where an authorized agent of the transporter can be reached.

STATE TRAN #2 ID—II applicable, enter the New Jersey State permit number of the waste carrying portion of the second vehicle.

TRANSPORTER PHONE—II applicable, enter a telephone number with area code where an authorized agent of the second transporter may be reached. STATE FACILITY SID—No entry is required by New Jersey.

FACILITY PHONE—Enter a telephone number with area code of the TSDF designated to receive the waste listed on the manifest.

WASTE NO.—Enter the 4-digit hazardous waste number as it appears in N.J.A.C. 7:26G-5.1 et. sec. (For example "No47" is the waste number that accurately describes the shipment, shall be determined according to the hierarchy at N.J.A.C. 7:26G-6.2.

ADDITIONAL DESCRIPTIONS FOR MATERIALS USTED ABOVE—Enter description of analysis for any waste which does not have a complete USDOT shipping description or has an in.o.s. designation. Enter a general description of the waste stream (i.e. groundwater contaminated with creosote and copper suitate). Additionally, for any nios. entry in Item 11 which does not conform to the requirements at 49 CFR 172-203(k) enter the two-components, and their percentages, which most predominantly contribute to the hazards of the mixture or solution. Enter the physical state (S = Solid, I. = Liquid, G = Gas. SL = Sludge) EPA hazard codes (I = Ignitable, C = Corroalve, R = Reactive, E = TCLP, H = Acute Heazardy, st. T = Toxic). Enter additional info

TRANSPORTER SECTION

TRANSPORTER 1 ACKNOWLEDGEMENT—Print or type the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

TRANSPORTER 2 ACKNOWLEDGEMENT—If applicable, follow instructions for item 17 for the second transporter.

ALL HAZARDOUS WASTE TRANSPORTERS OPERATING IN NEW JERSEY MUST HAVE A VALID NEW JERSEY HAZARDOUS WASTE TRANSPORTER'S PERMIT.

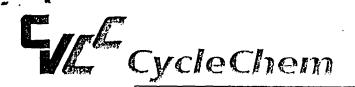
DESIGNATED FACILITY (TSDF) SECTION

DESIGNATED FACILITY (TSDF) SECTION

DISCREPANCY INDICATION SPACE—The authorized representative of the designated facility must note in this space any significant discrepancy between the weate described on the manifest and the waste actually received at the facility. Any rejected materials should be listed here, along with an explanation of the disposition of the rejective wastes. Owners and operators of facilities located in authorized States (i.e., those States that have received authorization from the U.S. EPA to administer the hazardous waste program) should contact their State agency for information on State Discrepancy Report requirements. FACILITY OWNER/OPERATOR CERTIFICATION—Print or type the name of the person receiving the waste on senal of the owner/operator of the designated TSDF. That person must acknowledge receiving the waste described on the manifest by signing and entering the date of receipt.

HANDLING CODES—TSDF SHOULD COMPLETE—Enter the ulfimate handling method utilized at the designated facility for each waste. Only the following process codes may be used Storage—SO1 (container); SO2 (Tank); TO2 (Surface Impoundment); SO3 (Inter-specify); Treatment—TO1 (Tank); TO2 (Surface Impoundment); SO3 (Inter-specify).

For interstate shipments you may be required to comply with the manifesting requirements of both the consignment and generator states regarding the completion of specific information included in lettered items A-K Please check with both generator and consignment states for specific requirements. New Jersey requires that all information be filled in except for litem. FA. Please check with both generator and consignment states for specific requirements. New Jersey requires that all information to filled in except for litem. FA. Please check with both generator and consignment states for specific requirements. New Jersey requires that all information to filled in except for litem. FC. Disease and disposal form. Send comments requiring the burden estimates including suggestions for its burde



9 116197

New Jersey DEP Hazardous Waste Regulation Program **Manifest Section** CN 421 Trenton, New Jersey 08625-0421

RE:

Manifest Number: NJA 2579444

Dear Sir:

Enclosed is a copy of the above referenced manifest. There is a discrepancy as defined in 40 CFR 264.72 (a) (1) on this manifest due to the material not matching the waste profile after analysis at Cycle Chem, Inc.'s NJDEP certified laboratory. The discrepancy has been corrected in Section 19 of the attached manifest. The material has been treated properly for the EPA waste code pursuant to the requirements of Cycle Chem, Inc.'s permit; number 2004E2HP05.

If you have any questions or comments please contact me.

Thank you.

Very truly yours,

Cycle Chem, Inc.

Jonathan C. Chewey, CHMM

Regulatory Affairs Officer

CC:

Generator

Generator State

Transporter

LTRWJDEP.2



Department of Environmental Protection and Energy "Hazardous Waste Regulation Program Manifest Section CN 421, Trenton, NJ 08625-0421

ease type or print in block letters. (Form designed for use	on elite (12 pitch) typewnter.)		1 Approved. DMB No. 1	 2050-0039. Expires 9-30
UNIFORM HAZARDOUS	enerator e US ETA ID No	Manifest 2 Document No.	2. Page 1 Informa	lion in the shaded areas required by Federal law
3. Generator's Name and United Address	टिकिम्मि राज्या हो से हो हो हो हो	#1.91-41-41-41-41-	A. State Manifest Docum	
Oana Container, Inc. 7254 Mt. Holly Road, Charlott 4. Generator's Phone (704) 309-3395	ATTN: James . e. NC 28214	Adama	3. State Generator's ID-	57944A Gen. Site Address)
5. Transporter 1 Company Name	C US EPA ID Hun	iber (C. State Trans. ID-NUDE	PE: 15 0 0 15 19
Mauree Express, Inc.	ामग्राम् श्राह्म हो।	0 7 3 8 0	. Decal No)
7. Transporter 2 Company Haper	A Section of the sect	27/93). Transporter's Phone (904 1424-4641
9. Designated Facility Name and Site Address	US EPA IO Non	abet The Paris		- 5815 / - 3318
Cycle Chem, Inc.		1	Transporter's Phone (900 322 SP
217 South First Street		▶ 4	3. State Facility's ID	
E11zaboth, N.J. 07205	N17101010131310	12. Contain		9 1353 <u>-5900</u>
11. US DOT Description (Including Proper Shipping Name ID Number and Packing Group)		112.	Type Quantity	Unit Wt/Vot Waste No.
RQ, Waste Corrosive Liqui PGII (Sulfonic Acid)	ica, n.o.s., 8, U41760	•	2.5g . 15g . 15	A STATE OF THE STA
X (DOO2)		zizi I	11 2 2 2 2 2 5 5	G 5101012
RQ, Hazardoun Wante, Ldq PGIII (Lead)	uid, n.o.s.,9, HA3052,			
7 (0008)		וצוצומו	0114 21 21 11615	000008
c. RQ, Harardous Waste, Sol.	ld. n.c.s., 9, NA3077.			
PGIII (Diesel Fuel, Gano				
X (D018)	·		<u> </u>	P D D D 1 1 8
RQ, Wente Flarmable Liqu	ide. n.o.e., 3, TM1993	.		
PGII (Xylone, Toluene)	A retire or	11	, , , , , , , ,	A ## 1
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for V	Vastes Listed Above
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a L.C. CHINZI-OO	Common manager continue.	据"常常是"	1950 . The 1960 . The	
(Virgin glycol 100%, tercerontesticates to Cloudres) 10-013	(Tylens 20-20), Tolumn 21 180 2023%, Petrolism Fish	Linear Zivil	Birth Ding	5501
15. Special Handling Instructions and Additional Information	OFHOY OF THE	a-d) 356	685-36 05 6	2
Emergency Contact 1-800-243-3	ARO.	•	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	
Plate# 11 11 For 5 15	American State of the State of	ほうりゅつ		
16 GENERATOR'S CERTIFICATION: Libéraby disclare th	at the centerts of this consument are t	ully and accubitely	described above by pre-	oper shipping name and are
classified, packed, marked, and taboled, and are in all regulations.	osports in proper condition for transport b	by highway according	ic to applicable internation	onal and national government
If I am a large quantity generator, I certify that I had to be economically practicable and that I have selected and future threat to human health and the environment and select the best waste management method that is	ed the progressless method of treatment, sto ent; OR, if I am a small quantity general	rago, or disposal c	urrently available to me-	which minimizes the present
Printed/Typed Name	Signature	(4)	77 (Month Day Year
James E. Adyor	1 Singer	l	John ma	ाण्यालता,
17. Transporter 1 Acknowledgement of Receipt of Material Printed/Typed Name	S Signature	/ _ 	<u> </u>	Month Day Year
A STATE OF THE STA	1 \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		• . •	Salabl
18. Transporter 2 Acknowledgement of Receipt of Materia	s Songy		<i></i>	- CRITICAL
Printed/Typed flame	Signature		25	Month Day Year
MILLANN SA	CH/	when,		- 125/KID
19. Discrepancy Indication Space	5) Cun il Carine	12 N (6)	HE COOCOUNT	7.3
DERRAGERIEN.	C)83/1/83/0	- 10/4cm	7,3.55 63,600)() S
TRILL	1 - 1 9- 0 Elt	til Doo	12 add II)72
20 Facility Owner or Operator Confilmation of receipt of f		nt except as noted i	n Itom 19.	
Punted/Typed Name	Signature	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	and the second s	Month Day Year
	1 Par V 1			

Date sent:

Mon, 15 Sep 1997 15:05:07 -0500

From:

BILL MILLER < EPBMILL@MAIL.JUS.STATE.NC.US>

To:

biusdl@wastenot.ehnr.state.nc.us,

meyerwl@wastenot.ehnr.state.nc.us,

Subject:

pagejs@wastenot.ehnr.state.nc.us, n1nh722@wsro.ehnr.state.n Dana Transport

RE: Dana Transport Compliance Order

A hearing date has been set for October 10, 1997 in Charlotte, NC at 9:00am in the Polk Building, 5th floor hearing room, 500 West Trade Street. To support the compliance order I will need Bill Meyer, Doug Holyfield, Joe Parker, and Jesse Wells at the hearing.

I understand there is a meeting that week on the Coast that will involve at least Bill, Doug and Dan. If Dana Transport does not withdraw its petition or the judge does not dismiss the case, I will attempt to obtain a continuance to accommodate the conference. There, of course, is no assurance OAH will postpone the hearing.

I will keep you advised.





Charlotte Fire Department



Fax Transmission

Sendee	Joe Parker	
Fax #	663-6040	
# of Pages	2	
Sender	BORT MASSEY	
Fax #	704/336-4204	
Remarks	PER OUR CONVERSATION	

RESPONSE MECKLENBURG COUNTY DEPARTMENT OF ENVIRONMENTAL PROTECTION EMERGENCY ALERT/RESPONSE FORM

DATE REPORTED: 06/10/97 TIME REPORTED: 2:12 PM SECTION: WO LOG NO: 97-01231 REPORTED BY: HAYES, BOB/DANA TRANSPORT CO TELEPHONE NO: (704) 399-3395 ADDRESS: 7254 MT. HOLLY RD CITY:
REPORTED BY: HAYES, BOB/DANA TRANSPORT CO TELEPHONE NO: (704) 399-3395
ADDRESS: 7254 MT. HOLLY RD CITY:
PROPERTY CONCERNED: FACILITY NAME: DANA TRANSPORT
ADDRESS: 7254 MOUNT HOLLY RD CITY: CHARLOTTE 28214
ADDRESS: 7254 MOUNT HOLLY RD CITY: CHARLOTTE 28214 SERVICE REQUESTED: SW-I-CI- DANA TRANSPORT
ASSIGNED TO: ANNE LOFTIN TAKEN BY: SARAH EDWARDS
ALERT
TYPE: MINOR DATE: 06/09/97 TIME: 12:00 PM REG NOTF BY: REC BY: DATE: // TIME: : MATERIAL SPILLED:
REG NOTF BY: REC BY: DATE: // TIME: :
MATERIAL SPILLED:
MATERIAL SPILLED: (1) ARCOPLUS AIRCRAFT DEICING FLUID OTY/UNIT: 30 GAL H/S: N R/Q: N (2) QTY/UNIT: H/S: R/Q: LOCATION: DANA TRANSPORT NEAREST CITY: CHARLOTTE COUNTY: MECKLENBURG REGION: 03 SPILLER: DANA TRANSPORT TELEPHONE: () STREET: STATE: ZIP: RESPONSIBLE PARTY: SPILLER (REFER TO COMMENTS FOR ADDRESS) NATURE OF SPILL: FIXED FACILITY CAUSE: VANDALISM SOURCE: PARKED TANKER TRUCK (DESCRIBE IN COMMENTS) CONTAMINATION-SW/SPECIFY: NONE CLASS: GW: N CLASS: SOIL: Y AQ: N OTHER: NONE FISH KILL/ESTIMATED #: 0 CONTAINMENT (Y/N): Y METHOD: TOPOGRAPHY OF AREA CLEANUP (Y/N): Y METHOD: EXCAVATION OF SOIL
LOCATION: DANA TRANSPORT
NEAREST CITY: CHARLOTTE COUNTY: MECKLENBURG REGION: 03
SPILLER: DANA TRANSPORT TELEPHONE: ()
STREET: CITY: STATE: ZIP:
RESPONSIBLE PARTY: SPILLER (REFER TO COMMENTS FOR ADDRESS)
NATURE OF SPILL: FIXED FACILITY CAUSE: VANDALISM
SOURCE: PARKED TANKER TRUCK (DESCRIBE IN COMMENTS)
CONTAMINATION-SW/SPECIFY: NONE CLASS: GW: N CLASS:
SOIL: Y AO: N OTHER: NONE FISH KILL/ESTIMATED #: 0
CONTAINMENT (Y/N): Y METHOD: TOPOGRAPHY OF AREA
CLEANUP (Y/N): Y METHOD: EXCAVATION OF SOIL BY WHOM: DANA TRANSPORT (SPILLER)
RY WHOM: DANA TRANSPORT (SPILLER)
DISPOSAL METHOD: PRIVATE LANDFILL BY WHOM: MICHIGAN DISPOSAL
SITE: MICHIGAN DISPOSAL WASTE TREATM CONFIRMED (Y/N): N
DISPOSAL METHOD: PRIVATE LANDFILL BY WHOM: MICHIGAN DISPOSAL SITE: MICHIGAN DISPOSAL WASTE TREATM CONFIRMED (Y/N): N
RESPONSE
RESPONSE (Y/N): Y TYPE: I (I=INVESTIGATE, T=TELEPHONE) NOV SENT (Y/N): N
BY WHOM: ANNE LOFTIN DATE: 06/10/97 TIME: 2:30 PM INCIDENT CLASSIFICATION (MIN=MINOR, MOD=MODERATE, MAJ=MAJOR): MIN
INCIDENT CLASSIFICATION (MIN=MINOR, MOD=MODERATE, MAJ=MAJOR): MIN
STATUS: CLOSED DATE: 06/24/97 E/A PENDING DATE: _/_/_
OTHER: DATE:
INVESTIGATIVE COSTS: MANHOURS #: 3 S60.00 LAB COSTS:
MILEAGE COSTS COUNTY: PRIVATE: OTHER:
OTHER AGENCIES INVOLVED:
NARRITIVE COMMENTS:
MR. HAYES OF DANA TRANSPORT INFORMED MCDEP THAT SOMETIME IN THE EVENING OF
6/9/97 (EXACT TIME UNKNOWN) A SAFETY VALVE WAS REMOVED FROM A TANKER STORING
DE-ICER. CLEAN-UP CONDUCTED BY DANA TRANSPORT.
•
MANAGEMENT OF MELINE DESCRIPTION WAS DEPARTUAL DEPARTS
NOTIFICATION OF FINAL DISPOSITION TO REPORTING PERSON
1) / dulto 7/1/20
(And 4) (NGALL: VERBAL:
ENVIRONMENTALIST'S SAFNATURE DATE
PEVIEWED BY: 1 OUT OUT 7-2-97 RECALL DATE: //
SECTION HEAD'S SIGNATURE

MOA#11 7/29/87 Revised 8/17/87



July 29, 1997

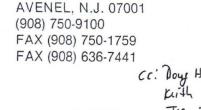
State of North Carolina
Department of Environment, Health and Natural Resources (DEHNR)
Mr. Daniel Buis
Waste Management Division
401 Overlin Road
Suite 150

Re: Dana Transport, Inc. NCD 074505850

Raliegh, North Carolina 27605

Dear Mr. Buis:





210 EAST ESSEX AVE.



First, please allow me to thank you for arranging the telephone conference that had been held with enforcement and compliance management on Monday, July 28, 1997 regarding the aforementioned subject matter. Furthermore, I have received and read the penalty assessment worksheets and associated penalties as assessed. I, again, thank you for forwarding these documents for my review. As discussed during the telephone conference, most aspects of the RCRA program existed on-site, and on-site staff demonstrated knowledge and guidance with respect to the RCRA program. Moreover, as demonstrated in ensuing inspections, any requested corrective actions have been summarily addressed and undertaken as exhibited in both operational and administrative fashion. Functional changes have been undertaken by Corporate since the inspection to enhance on-site management, which resulted in accountability changes as well as positional changes to ensure continued regulatory compliance.

In closing this memorandum, the objective of enforcement is to gain compliance and to promote guidance and education. This objective has been achieved as exhibited in procurement of equipment, training provided and the presence of an environmental ethos that promotes and ensures guidance and education in all aspects of regulatory compliance.

As to mitigating factors, the undersigned avers that facility staff members have embraced administrative requirements as demonstrated in subsequent inspections held by both County and State officials. As represented by my continuous travel and good faith efforts provided by Corporate President Ronald B. Dana, this matter will be reviewed as the exception rather than the rule. With respect to associated penalties, Mr. Dana has offered eight thousand dollars to initiate resolution to this matter. Moreover, with respect to forthwith corrective actions and continued good faith, please consider these rudiments in the State's penalty resolution decisions. Again, compliance has been achieved and a continued commitment to administrative requirements has been addressed and implemented.



Department of Environment, Health and Natural Resources Page Two

Should you have any queries whatsoever, please contact the undersigned's office at (800) 733-3262, Ext. 106. I find it noteworthy to mention that I shall be on leave until 11 August 1997.

Respectfully,

Daniel J. Bonanni

Director

Corporate Regulatory Affairs

Dana Corporation

Djb:st ncdnov



DANA CONTAINER, INC. 7254 Mount Holly Road Charlotte, NC 28214 Tel: (704) 399-3395 Fax: (704) 399-3303

FAX COVER SHEET

DATE: 06/25/97
To: Joseph Parker Jr
COMPANY: DEHNR
PHONE: 704 663 6040
FROM: Dana Container (Charlotte, N.C.)
NUMBER OF PAGES (INCLUDING COVER)
MEMO: This will be our training notebook.
Each empolyee will have a signed
copy in their training file, If this
doesn't meet DEHNR requirments
please Ict me know, 1-800-796 3262.
Bob Hayes

DESCRIPTION/TRAINING RECORD FOR HAZARDOUS WASTE MANAGEMENT/DISPOSAL POSITIONS

Per CFR 265.16, this record must be maintained at the facility.

FACILITY: DANA TRANSPORT UNIT: DANA CONTAINER

ADDRESS: 7254 Mount Holly Rd. Charlotte, NC

PHONE: (704) 399-3395

EMPLOYEE NAME: ATTACHED LIST

JOB TITLE: TANK/TOTE CLEANER, WASTE MANAGEMENT HANDLER 🤲

HAZARDOUS WASTE RELATED QUALIFICATIONS AND DUTIES (INCLUDE

REQUISITE SKILLS, EDUCATION, OR OTHER QUALIFICATIONS): The above person works with and handles hazardous materials and wastes at worksite located at DANA TRANSPORT. This person has the appropriate qualifications to read, understand, apply and communicate written and verbal information regarding handling and managing hazardous wastes. Training is required within six (6) months of assuming duty and once a year thereafter. He is responsible for proper handling, documenting, inspecting and transporting hazardous wastes. He is also responsible for responding to emergencies. The above individual commenced these duties on or about

SPECIFIC HAZARDOUS WASTE TRAINING RECORD

EMPLOYEE NAME: SEE ATTACHED LIST	
JOB TITLE: WASTE MANAGEMENT HANDLER	
I certify that I have received training in the following ar the date(s) indicated, and that I understand all infor presented:	aas on mation
AREA COVERED BY TRAINING	DATE
 Specific hazardous wastes to be managed: Heel from tank trailer Heel from totes Waste Water 	
2. Proper container(s) to be used	-
3. Placement of waste into container(s)	**************************************
4. Required container labels	145.4 E
5. Dating containers	1 4
Satellite accumulation requirements(if applicable)	
7. Acid/base neutralizations	
8. Emergency notifications and response	-
9. Container inspection procedures	
10. Lab safety manual hazardous waste policy review	
EMPLOYEE SIGNATUREDATE	· · · · · · · · · · · · · · · · · · ·
TRAINER	

RCRA DOCUMENTATION FOR COMPLETION OF TRAINING OF HAZARDOUS WASTE HANDLER

I do understand the requirements of this position, and having been trained to fulfill these requirements, believe I am fully competent to discharge the responsibilities outlines for the hazardous waste handling.

WASTE HANDLER: SEE ATTACHED LIST

DATE:

A CAMPA

LIST OF WASTE MANAGEMENT HANDLERS

ROBERT HAYES

JAMES ADAMS

ROLLIE WALKER

BURT WHITE

TOMMY DAVIS

BOBBY FLUITT

LOUIS PHILLIPS

BYNUM GRIER

ROBERT DAVIS

ANDREW KILLMAN

EACH EMPLOYEE RECEIVES THE FOLLOWING TRAINING TO WORK AS A TANK/TOTE CLEANER

CONFINED SPACE RE

HAZARD COMMUNICATION

MATERIALS HANDLING

CONTINGENCY PLAN

EVACUATION PLAN

POWER SHUT OFF

SPILL PROCEDURES

RESPIRATION PROGRAM

FALL PROTECTION

WASTE MANAGEMENT

FORK LIFT OPERATIONS

ON SITE INSPECTIONS

PERSONAL PROTECTIVE CLOTHING

O METER OPS-SERVICE

INSPECTION LABELS

MSDS UTILIZATION

STAFF TRAINING

DRILL/LOCATION- GATHERING POINT

EVACUATION/FIRE TNG

NOTIFICATION EMERGENCY RESPONSE

ON THE JOB TRAINING ON HOW TO CLEAN TANK/TOTE.

THIS TRAINING IS ACCOMPLISHED BY USE OF TRAINING CLASSICS HANDBOOKS/TEST, AND FORMAL INSTRUCTION OF TRAINING

STIBEHED IS A LIST OF TRAINED PERDONNEL.

LIST OF VIDEOS SHOWN FOR TRAINING

- 1. THE MSDS THE KEY TO COMPLIANCE
- 2. DETECTION AND PREVENTION
- 3. THE BAFETY TRIANGLE
- 4. CONFINED SPACE
- 5. HM 126 F
- 6. FORKLIFT OPERATIONS AND SAFETY
- 7. LOCKOUT TAGOUT
- B. DYNAMATION INC. AGM 502 & 502R TRAINING (DXYGEN METER)

LIST OF HANDBOOKS USED FOR TRAINING

HAZARD COMMUNICATION TRAINING

Information and Training Labels and Labeling Material Safety Data Sheets Hazardous Chemical Inventory

CONFINED SPACE TRAINING

Authorized Entrant Duties Attendant Duties Rescue and Emergency

HM -126 F

General Awareness Safety Training

FORKLIFT SAFETY

LOCKOUT TAGBUT

.....

LIST OF EMPLOYEES TRAINED TO WORK AS TANK/TOTE CLEANERS

ROBERT HAYES

JAMES ADAMS

ROLLIE WALKER

BURT WHITE

TOMMY DAVIS

BOBBY FLUITT

LOUIS PHILLIPS

BYNUM GRIER

ROBERT DAVIS

ANDREW KILLMAN

. w.c.-



DANA CONTAINER, INC. 7254 Mount Holly Road Charlotte, NC 28214 Tel: (704) 399-3395 Fax: (704) 399-3303

FAX COVER SHEET

DATE: 06/26/9%
TO: Mr Joseph Parker Jr
COMPANY: DEHNR
PHONE: 704 663 6040
FROM: Dana Container (Charlotte N.C.
NUMBER OF PAGES (INCLUDING COVER) 2
MEMO: This is the recipts where I sent
copies of Dana's Contingency Plan
to each agency.
Bob Hayes

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7254 Mount Holly Road, Charlotte, NC 28214 (704) 399-3395 FAX: (704) 399-3303

FAX COVER SHEET

DATE: 6-26-97
To: Mr. Joseph Parker Jr.
COMPANY: DEHNR
PHONE: 704-663-6040
FROM: Dana Container (Charlotte, NC)
NUMBER OF PAGES (INCLUDING COVER)
MEMO: This is the Coordination
Agreements you ask me to get. I talked
to each agency this was their guidance. Please let me Know if this meets DEHNR
requir ments 1800 796 3262 Thanks, Bob Hayes

COORDINATION AGREEMENTS

CHARLOTTE-MECKLENBURG FIRE DEPARTMENT - 911 - OR 336-2441

-The Charlotte-Mecklenburg Fire Department has received copy of the contingency plan.

-The Charlotte-Mecklenburg will inspect the facility once year and will check out emergency equipment.

-The Charlotte-Mecklenburg Fire Department requires Dana tdial 911 for Haz Mat.

CHARLOTTE-MECKLENBURG POLICE DEPARTMENT 911 or 336-3190

-The Charlotte-Mecklenburg Police Department has received copy of the contingency plan.

-The Charlotte-Mecklenburg Police Department requires Dar to dial 911 for emergency response.

CAROLINA'S MEDICAL CENTER (HOSPITAL) 355-3052

-Carolina's Medical Center has received a copy of the contingency plan.

-The Emergency team requires nothing from Dana because the Police or Fire Departments will coordinate with them.

1.2 \$4,14 LB1,\$50 10 CF\$

SENDER: "Complete items 1 and/or 2 for additional services. "Complete items 3, 4a, and 4b. "Print your name and address on the reverse of this form so that we card to you. "Attach this form to the front of the mailpiece, or on the back if space permit. "Write "Return Receipt Requested" on the mailpiece below the article "The Return Receipt will show to whom the article was delivered and delivered.	ce does not	I also wish to receive following services (from extra fee): 1. Addressee's 2. Restricted In Consult postmaster	or an s Address Delivery
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8 DANA TRANSPORT INC	Registere	ed #	Certified C
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RCRIS

EPA ID #: NCD 074 505 850

FACILITY NAME: Dana Transport, Inc.

CITY: Charlotte, N.C.

EVALUATION DATA:

NEW:

CHANGE: X DELETE:

PERSON: 029

BRANCH: 01

AGENCY: STATE

REASON: 01

SUPERVISOR NOV TRACKING INFO

TYPE: CSE

INITIAL INSPECTION DATE: January 28, 1997

DOCKET: 97-203

REINSP DATE: June 23, 1997

COMMENTS: Facility is in compliance with the Compliance Order with Administrative

Penalty

GENERATORS:

GBF: GER: GGR:X GLB:X GMR:X GOR: GPT:X GRR:X GSC: GSQ:

TRANSPORTERS:

TGR: TMR: TOR: TRR: TWD:

TSD's

DBF: DCH: DCL: DFR: DGS: DGW: DIN: DLB: DLF: DLT: DMC:

DMR: DOR: DOT: DPB: DPP: DSI: DTR: DTT: DWP:

USED OIL:

TUO: TFO: BUO: MUO: PUO: RUO:

VIOLATION DATA: New: Change: X Delete:

1. Agency: State Type: GGR Date Determined: 1-28-97

Class: 1 Priority: Seg#

Returned to Compliance: Actual Date: June 23, 1997 Req. Description: 40 CFR 262.11

Comment: Waste determination needed on two, fifty-five gallon containers noted during

the inspection

Date Determined:1-28-97 2. Agency: State Type:GPT

Class: 1 Priority: Seq.#

Returned to Compliance: Actual Date: June 23, 1997 Reg. Description: 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.173(a)

Comment: Facility failed to keep a container used for accumulating hazardous waste closed during storage.

3. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174

Comment: Facility failed to retain records of required inspections on containers of

hazardous waste in storage.

. =

4. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(2)

Comment: Facility failed to mark 12-55 gallon containers holding hazardous waste with

accumulation start date

5. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(3)

Comment: Facility failed to label one container holding hazardous waste with the words

"Hazardous Waste".

6. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1)

Comment: Facility failed to develop a training program for their employees on

hazardous waste management

7. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) Comment: No annual review of hazardous waste training

8. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Reg. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(1)

Comment: No job titles

9. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

J : #

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(2)

Comment: No written job descriptions

10. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(3)

Comment: No written descriptions of the type and amount of training

11. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(4)

Comment: No records of training

12. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Reg. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.31

Comment: Failed to minimize a possibility of a release of hazardous waste

13. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.35 (Subpart C)

Comment: No aisle space

14. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 26, 1997

Reg. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.53(b)(subpart D)

Comment: Facility failed to submit copies of a revised contingency plan to local

authorities

15. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.54(subpart D)

Comment: Facility failed to immediately amend their contingency to show change in emergency coordinators.

16. Agency: State Type:GLB Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance: Actual Date: June 23, 1997

1 1: . #

Req. Description:40 CFR 268.7(a)(7)

Comment: Facility failed to maintain copies of LDR's

RCRA INSPECTION REPORT

(x= violation, na= not applicable)

	cation 1254 MT. HOLLY ROAD, CHARLOTTE,	N.C. 78714 .	
Ma	ailing Address	•	
EP.	AID.# NCD 074 505 850 Phone # 10	14-399-3395	
Co	intact/Title Robert HAYES		
	spection Date <u>Tune</u> 23, 1997 Last Inspec	tion JANUARY 28 1997	
Sta	atus LARGE QUANTITY GENERATOR Type of Ins	spection CSE	
Wa	aste Management Specialist(s) Joseph Parker, Je	ESE WElls	
Pre	esent at Inspection MR. Robert HAYES - MANAGE	£	
	pe of Business TANKER WASHING FACILITY		
	aste Generated <u>POOI</u> , <u>DOOB</u> , <u>FOO5</u>		
* Cond	HOU A - Waste Determination on unknown contained	r - Completed, sent off as Hz. WASH	•
	anifests:	, , , , , , , , , , , , , , , , , , , ,	
Αp	proved Transporters?Approved	TSD's?	
		ed Out Correctly?	
	PR Notification Attached? The facility has abtain		
	AM fest #15 08296/8-9-96) and 68396(11-5-9		
	NDIFON F		
W	aste Minimization? How?		

⊮ H a	zardous Waste Inspection Records: Condition's Ba	2 +83	
Ins	spections On Storage Area <u>Good Inspections. In Co</u>	2+83 mpliance with Condition B-2+3	
Ins Ins	spections On Storage Area <u>Good Inspections. In Co</u>	2+83 mpliance with Condition B-2+3	
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Ins Ins Ins	spections On Storage Area <u>Good Inspections</u> , In Consections On H.W. Tanks <u>NA</u> spection On Ancillary Equipment <u>NA</u> spection On Ancillary Equipment <u>NA</u> spection On Ancillary Equipment <u>NA</u>	2+83 mplance with Cordition 8-2+3	
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Facility Name DANA TRANSPORT INC.	EPA I.D. # NCD 014 505 850
Inspection Date June 23,1917	
Employee Interview: 12/4 Names(s)	Trained
Annual Report Submitted? \(\sqrt{A} \)	Copy At Facility?
Emergency Preparedness: Facility Maintained And Operated To Pr Internal Communications Or Alarm Pres Device In Area Of Operation To Summo Portable Fire Extinguishers And/ Or Fire Spill Control Equipment? Ves Adequate Water Volume, Foam, Equipment	ent?on Outside Help?_Yese Control Equipment?_Yes
All Equipment/ Alarms Tested And Main All Personnel Handling H.W. Have Acce Aisle Space In Area Of Facility Operation	ess To Alarm/ Device? <u>1/6 S</u>
container used for accumulation	ocation(s) Both satellite Areas have 1-55 pallow purposes - Both containers are proposely
Containers: Closed? Labeled?	55 gal. Stored 3 days if full?
Storage Area(s): 1 Description Dress Were observed to be IN storage.	of the Reinspection, 17-55 gallow containers fil containers were property labeled as a lation start dated, and closed
•	Labeled? Releases? Nove
Dated? <90 days	Good condition?
Other H.W. Units: (Applicable Regulat	tions)
Description of Unit	
External Facility Condition The facility in handing their hazardons wash	e passife.

Site Deficiencies: 1.) 40 CFR 2.) 40 CFR 3.) 40 CFR 4.) 40 CFR 6.) 40 CFR 6.) 40 CFR Continued: Demonth the lacility's continued: (coplanting emeratory agricus, when this is done discurrent that these trisions has been sent to the Fire Deet. Police Out. and Hospit With Encility areas the hospit expension and peen sent to the Fire Deet. Police Out. and Hospit With According emeratory and Hospit when the fire Deet. Police Out. and Hospit With the sense of the sense of the completed send this office copies at these updated documents. [Interpretation of the process of the information compiled from the recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the certain letter recommendations made above the facility faxed copies of the recommendations of the certain letter recommendations made above the facility faxed copies of the recommendations of the certain letter recommendations made above the facility faxed copies of the recommendations and the facility faxed copies of the recommenda	Facility Name DANA TRANSPORT, INC.	EPA I.D.# NCD 074 505 250
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Λ Λ	RCRA Inspector (date)	Pacility Contact (date)

RCRA INSPECTION REPORT

(x= violation, na= not applicable)

	Facility Name DANA TEANSPORT, INC.
	Location 7254 MT. HOLLY ROAD, CHARLOTTE, N.C. 79714
	Mailing Address
	EPA I.D.# NGD 074 505 850 Phone # 704-399 - 3395
	Contact/ Title Robert Hayes
	Inspection Date July 23 1997 Last Inspection JANUARY 28 1997
	Status LARSE QUANTILY GENERATOR Type of Inspection CSE
	Weste Management Specialists Charles Trace and the
	Waste Management Specialist(s) Joseph MARKER, JESSE WELLS Present at Inspection M2. Robert HAVES - MANAGER
	Type of Business TANKER WAShing FACILITY
	Waste Generated <u>Paol, Pools, Fools</u>
	Manifests:
	Approved Transporters? Approved TSD's?
	Signed Copies? Filled Out Correctly? Filled Out Correctly? LDR Notification Attached? Facility has obtained LDRS on Condition F
C	LDR Notification Attached! Pacific 145 BYAINED CORS MI CONDITION F
	Waste Minimization?How?
F	Hazardous Waste Inspection Records: Condition B-2,3 Inspections On Storage Area 690d Inspections Inspections On H.W. Tanks w/A
	Inspections On H.W. Tanks/4 Inspection On Ancillary Equipment/4
	Zaspoodon On Fallomary Equipment 1/1/2
4	Contingency Plan: Condition E-4
•	On Site? 165
	Any changes to facility/ processes or Emergency Coordinators since last review? 1/0
	Contingency Plan used? (if yes, was it adequate?)
	Agreements with Emergency Personders Heat to Delite and Tree On the All to he as he delite
	Agreements with Emergency Responders 200 10 DENNE ALL AND TO SENTED COCAL HOS
-/	Agreements with Emergency Responders? Sent to DetWit and Free Dept Need to be sent to local Hope Considerate Agreements where requirements where requirements where requirements the sent to the sent to local Hope Training Records: Condition E
_	Training Records: Condition E
	Certified Training Documents Available? 465
	Any New Employees Since Last Review? Everyone has book featured at the facility
	Evidence Of Improper/ Inadequate Training?
J.	from A - Container sent off hazardons waste
u ((
	Fraily woods to be specific to hazardous waste. This training
	THATTY NOVOS US DEANIZE THEIR THEIR
	drawent words to be socilic to hazardous waster.

Facility Name <u>NAWA IZANSPORT</u> I	NC. EPA I.D.# NCD 074 305 850
Inspection Date June 23 1597	
	·
Employee Interview:	
Names(s)	Trained
·	
A1 D C.1 10	O A- T110
Annual Report Submitted?	Copy At Facuity?
Emanana Pranandases	
Emergency Preparedness:	Prevent Releases?
Internal Communications Or Alarm Pr	
	mon Outside Help?
-	Fire Control Equipment?
C. 111 C41 T	
Adequate Water Volume Foam Four	ipment, Or Auto Sprinkler?
	Initiation of Proceedings of Procedure Springs of P
- ·	ccess To Alarm/ Device?
Aisle Space In Area Of Facility Opera	
	,
Satellite Accumulation Area(s) Z	Location(s) Both frees HOR 1-55 gallow mylation - Continues are lateled and
continuer used for Sat. Decay	mylotion - Continuen que (sheld and
deted as a hore. Whole	
••	
Containers: Closed? Labeled?	Stored <3 days if full?
Storage Area(s): / Description_//	1-55 gallow containous in storage
all lawled desal as have h	15 Fe
Containers: Closed? . Kisle snace?	Labeled? Releases? 10
Containers. Closed!Aisie space!	Labeleu (Releases (
Dated? <90 da	ys?Good condition?
	,
Other H.W. Units: (Applicable Regu	lations)
Description of Unit	
Estamal Facility Condition	•
External Facility Condition	
	·

Facility Name <u>PANA TRANSPORT</u> , INC. Inspection Date <u>JUNE 23, 1997</u>	EPA I.D.# <u>NCD 074</u> .	505 950
Inspection Date <u>June</u> 23, 1997	•	
Site Desiciencies:		
1.) 40 CFR		
2.) 40 CFR		
3.) 40 CFR		
4.) 40 CFR		
5.) 40 CFR		
6.) 40 CFR		
to 23.97	Robert 7 Haye	x 06/23/8
RCRA Inspector (date)	Facility Contact	(date)
Follow Up Inspection:		
Comments		
RCRA Inspector (date)	-Facility Contact	(date)

NCDEHNR - Hazardous Waste Section

919 N. Main Street Mooresville, N.C. 28115 704-663-1699 Fax: 704-663-6040

FAX TRANSMISSION COVER SHEET

Date:

June 23, 1997

To:

Mr. Robert Hayes - Dana Transport, Inc.

Fax:

704-399-3303

Re:

Sample Training Documents

Sender:

Joseph S. Parker

YOU SHOULD RECEIVE PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 704-663-1699.

SAMPLE TRAINING DOCUMENTS

Mr. Mayes,

Let me know if you have any questions concerning this Material. I will be sending your copy of the "rester" inspection report in the mail.

Joe Panker

JOB DESCRIPTION/TRAINING RECORD FOR HAZAFLOUS WASTE MANAGEMENT/DISPOSAL POSITIONS 40
Fer CFR 265.16, this record must be maintained at the facility.
FACILITY: UNIT:
ADDRESS:
PHONE:
DATE:
EMPLOYEE NAME:
JOB TITLE:
HAZARDOUS WASTE RELATED QUALIFICATIONS AND DUTIES (INCLUDE REQUISITE SKILLS,
EDUCATION, OR OTHER QUALIFICATIONS): The above person works with and handles
hazardous materials and wastes at worksite located at This
person has the appropriate qualifications to read, understand, apply and communi-
te written and verbal information regarding handling and managing hazardous wastes.
Training is required within six months of assuming duty and once a year thereafter.
He is responsible for proper handling, documenting, inspecting and transporting
hazardous wastes. Ee is also responsible for responding to emergencies. The
above individual commenced these duties on or about19
DESCRIPTION OF TRAINING (FOR FORMAL TRAINING) (FOR INFORMAL TRAINING, ENTER "ON THE JOB TRAINING", ENTER EMPLOYEE SIGNATURE INSTRUCTOR(S).)

Specific Hazardous Waste Training Record

Employes initials	Trainer Initials	Date Area covered by training
		1. Specific hazardous wastes to be managed:
·		
		2. Proper container(s) to be used
		3. Placement of waste into container (s)
		4. Required container labels
		5. Dating containers
		Satellite accumulation requirements (if applicable)
		7. Acid/bass neutralizations
		8. Emergency notifications and response
<u>:</u>		9. Container inspection procedures
		10. Lab salety manual hazardous waste policy review

RCRA Documentation for Completion of Training of Hazardous Waste Handler

I do understand the requirements of this position, and having been trained to fulfill these requirements, believe I am fully competent to discharge the responsibilities outlined for the hazardous waste handling.

Waste Handle:	<u> </u>		
			Date
		•	• • • •
Supervisor	·		
			Date

Training Records (40 CFR 265.16)

- 1. Content: Because there are so many different types of processes and jobs related to hazardous waste, there is no approved training course specified in the regulations. It is the facility's responsibility to determine what your employees need to know to ensure the facility's compliance with the regulations and to ensure that they will not harm themselves. Each employee who has duties involving hazardous wastes must be trained in their actual duties handling hazardous wastes, or as the regulations state: "relevant to the position in which they are employed". The employees also must be trained in emergency procedures and they must be able to respond EFFECTIVELY to emergencies. The training must include a review of YOUR SITE SPECIFIC contingency plan.
- 2. Who can conduct training: The person conducting the employee training must be trained in hazardous waste management. Notice, again there is no approved training program for instructors. You should have documents at the facility, however, showing that the person conducting the training is qualified to do so.
- 3. Who to train: All employees who, as a function of their job handle hazardous wastes, or have the potential to handle hazardous waste, must be trained. This includes all personnel who actually handle hazardous wastes, emergency response crews, and emergency coordinators. If an employee's only hazardous waste duty is to place hazardous wastes into a satellite container and they would not respond if the container leaked or ruptured, that

employee does not have to participate in the training. The Hazardous Waste Section, however, recommends that they be trained.

New employees (new employees to the facility or employees that are new to that position) have a "grace" period of 6 months to be trained but cannot work unsupervised around hazardous wastes.

4. Documentation required to be present at the facility:

- a. <u>Job titles and job descriptions</u> for positions that include hazardous waste responsibilities and the name of each employee filling that position. The description must include the education and training required for that job. This job description must describe the duties SPECIFIC TO HAZARDOUS WASTE ACTIVITIES expected of that employee.
- b. Type and amount of both introductory and continuing training conducted. i.e. the content of what you trained the employees on.
- c. Records that document that training was given. This can be a sign off sheet, or other method of verifying that the employees were trained. (see attached examples).
- 5. <u>How often</u>: Training must be conducted annually, on or prior to the anniversary date of the previous training, not once per year. This means if you trained employees on January 22, 1993, they must have their annual update on or before January 22, 1994.

Training documents are one of the exceptions to the three year rule. All training documents must be kept on-site <u>until the</u> facility closes. Training records for former employees must be kept for three years (minimum) from the time the employee left the facility.

Common errors found in training programs:

- 1) Not maintaining training records at all
- 2) Job descriptions not specific to hazardous waste duties.
- 3) Job descriptions not including the requisite skills needed to perform that job.
- 4) Not training personnel on the contents of the contingency plan and emergency procedures.
- 5) Not training emergency coordinators.
- 6) Not conducting training annually, by the anniversary date.

Example of

Coordination Agreements

- Nature Valley Fire Department (Tel. 265-3456):
 - The NVFD has received a copy of the contingency plan.
 - The NVFD will inspect the facility twice a year and will check out emergency equipment.
 - The NVFD personnel have received a special briefing on handling of cyanide waste spills.
 - The NVFD has identified sources of additional support for emergencies beyond its own capabilities.
- Nature Valley Police Department (Tel. 265-7890):
 - The NVPD has received a copy of the contingency plan.
 - The NVPD personnel have received a special briefing on the hazards of cyanide waste spills and have worked out evacuation routes and procedures.
- Pity Hospital (Tel. 265-5678) *:
 - Pity Hospital personnel have received a special briefing on the health hazards of cyanide waste and on treatment for exposure
- *Pity Hospital has also filed action with the Board of Zoning Appeals to revoke Clean Environs' special operating permit as a hazard to the safety of their patients.
- Nature Valley Mayor's Office (Tel. 265-1234):
 - The Mayor or his deputy will decide on whether and when to evacuate residents from neighboring sections of town.
- Mogul Petroleum Depot (Tel. 265-9012):
 - Mogul Petroleum Co. and the Clean Environs Hazardous Waste Facility have exchanged copies of their contingency plans and made provisions to assist one another in the event of an emergency at either facility.
 - Mogul Petroleum personnel have received a special briefing on the hazards of exposure to cyanide waste.
- National Response Center (Tel. 800-424-8882):
 - The National Response Center in Washington has been contacted to obtain guidance on handling of cyanide waste spills and to verify notification procedures.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor Jonathan B. Howes, Secretary William L. Meyer, Director



May 21, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Hayes Dana Transport, Inc. 7254 Mt. Holly Road Charlotte, North Carolina 28214

Re: Dana Transport, Inc. NCD 074 505 850

Dear Mr. Hayes:

SHORT FORM COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY DOCKET #97-203



On December 18, 1980, the State of North Carolina Division of Waste Management ("Division"), was authorized to operate the State RCRA hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (the "Act"), and the rules codified at 15A NCAC 13A (the "Rules"). William L. Meyer, Division Director, has been delegated the authority to implement the Act and Rules. Based on an on-site inspection on January 28, 1997, it has been determined that Dana Transport, Inc. is in violation of certain requirements of the Act and Rules as set forth below.

- 1. Dana Transport, Inc. ("Dana") is a company who conducts business in North Carolina and generates hazardous waste as defined in N.C.G.S. 130A-290(8) and 15A NCAC 13A .0102, in Charlotte, Mecklenburg County, North Carolina. Dana is a person as defined in N.C.G.S. 130A-290(22) and 15A NCAC 13A .0102.
- 2. 40 CFR Part 262, codified at 15A NCAC 13A .0107, contains standards and requirements applicable to generators of hazardous waste.
- 3. Dana is listed with the Division as a large quantity generator. A large quantity generator is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and 40 CFR 268.7(a)(4).
- 4. Dana is located on approximately two acres of land in Charlotte, in Mecklenburg County, North Carolina. Dana is a tank cleaning operation that generates D001 and D008 hazardous wastes at its facility.
- 5. On January 28, 1997, Mr. Joseph Parker and Mr. Jesse Wells, Waste Management Specialists with the Division, conducted an inspection at Dana. During the inspection, Mr. Parker conducted a paperwork audit, which included looking at all manifests generated since

P.O. Box 27687, Raleigh, North Carolina 27611-7687 Voice 919-733-4996



FAX 919-715-3605 An Equal Opportunity Affirmative Action Employer 50% recycled/10% post-consumer paper 1994. The audit revealed that D001 (ignitable liquid) and D008 (lead) wastes were generated at the facility. These wastes are generated during the tank cleaning process. The facility cleans large tanks, which connect to tractor-trailers for over the road shipment. The cleaning process is performed after the tanks are unloaded. During the tank cleaning process, the heel of the tank is cleaned out first. The heel consists of the material residue from the product shipped in the tank. It is at this point that a solid waste is generated. Depending on the type of material cleaned out of the tanker, the facility generates a hazardous waste or a nonhazardous waste. This material is then containerized in fifty-five gallon containers and held for shipment to a treatment/storage/disposal facility.

During the inspection Mr. Joseph Parker noted that the facility was in violation of several requirements of 40 CFR 262, and other violations contained in 15A NCAC 13A . Specifically:

- A. 40 CFR 262.11, codified at 15A NCAC 13A .0107, states that a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:
 - 1. a. He should first determine if the waste is excluded from regulation under 40 CFR 261.4 and 261.5.
 - b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.
 - c. For purpose of compliance with 40 CFR part 268, or if the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, the generator must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - (A). Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261 or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 - (B) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.

Dana is in violation of 40 CFR 262.11, codified at 15A NCAC 13A .0107, in that the facility generated solid waste, as defined in 40 CFR 261.2 and failed to determine if the waste was a hazardous waste. Specifically, Dana failed to conduct a waste determination on one(1) 55-gallon container located in the Tote Washing Area. This container was noted as having trash intermingled with other unidentified solid waste. The content of this container was not properly characterized and handled accordingly. A strong solvent odor was noted at the time of the inspection.

B. 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and the generator complies with Subpart I, AA, BB and CC of 40 CFR Part 265.

- 1. 40 CFR 265.173(a), codified at 15A NCAC 13A .0110 states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
- 2. 40 CFR 265.174, codified at 15A NCAC 13A .0110 and 15A NCAC 13A. 0110 states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.
- 3. 15A NCAC 13A .0110(i) states that the owner/operator shall keep records and results of required inspections for at least three (3) years from the date of the inspection.

Dana is in violation of 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, in that it accumulates hazardous waste on-site for 90 days or less without a permit or without having interim status, in that waste is placed in containers and it did not comply with Subpart I, AA, BB and CC of 40 CFR Part 265. Specifically:

- 1. One (1) container of hazardous waste was not closed during storage, as required by 40 CFR 265.173(a).
- 2. Dana did not inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors as required by 40 CFR 265.174 (Subpart I), codified at 15A NCAC 13A .0110.
- 3. There were no hazardous waste inspection records maintained at the facility.
- C. 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Dana is in violation of 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107, in that it failed to mark their containers holding hazardous waste with accumulation start dates. During the inspection, it was noted that twelve (12) 55-gallon containers, holding hazardous waste, were not marked with an accumulation start date while in storage.

D. 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107, states that while being accumulated on-site each container holding hazardous waste must be labeled or clearly marked with the words "Hazardous Waste."

Dana is in violation of 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107, in that one 55-gallon container being used to accumulate hazardous waste in the Tank Cleaning Area was not clearly marked with the words "Hazardous Waste."

E. 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and

with 40 CFR 268.7(a)(4).

- 1. 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110, states that facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with this program and includes all the elements described in the document required under paragraph (d)(3) of this section.
- 2. 40 CFR 265.16(c), codified at 15A NCAC 13A .0110, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.
- 3. 40 CFR 265.16(d), codified at 15A NCAC 13A .0110, states that the owner or operator must maintain the following documents and records at the facility:
 - The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
 - (2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
 - A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section;
 - (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.
- 4. 40 CFR 265.53(b)(Subpart D), codified at 15A NCAC 13A .0110, states that a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.
- 5. 40 CFR 265.54(Subpart D), codified at 15A NCAC 13A .0110, states the contingency plan must be reviewed, and immediately amended when the list of emergency coordinators changes.

Dana is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, in that it accumulated hazardous waste on-site for 90 days or less without a permit or without having interim status, and did not comply with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4). Specifically:

- 1. Dana failed to develop a training program for their employees on hazardous waste management in accordance with 40 CFR 265.16(a)(1).
- 2. Dana failed to provide an annual review of the initial training required in paragraph (a) of this section, as required by 40 CFR 265.16(c).
- 3. Dana did not maintain the following documents and records at the facility as required by 40 CFR 265.16(d):
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
 - (2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section.
 - (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.
- 4. Dana failed to submit copies of the facility's revised contingency plan to the local police departments, fire departments, hospitals, and State and local emergency response teams.
- 5. Dana failed to immediately amend its contingency plan to reflect a change in emergency coordinators.
- F. 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0112, states that generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2-261.6, or exempted from Subtitle C regulation, subsequent to the point of generation.

Dana is in violation of 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0012, in that it did not retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. Specifically, Dana did not maintain Land Disposal Restriction

notices for manifest document numbers 08296 dated 8/9/96 and 08396 dated 11/5/96.

ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$25,000.00 per day for each violation of the hazardous waste provisions of the Act, Rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty that includes the degree and extent of the harm caused by the violation and the cost of rectifying the damage. 15A NCAC 13A .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.

After careful consideration of each factor above, penalties are assessed as follows: A. \$5,500.00; B. \$5,500.00; C. & D. \$5,500.00; E. \$5,500.00; and F. \$1,760.00. Accordingly, a total penalty is imposed in the amount of \$23,760.00.

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Dana is hereby ordered to take the following actions:

- 1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, payable to the Division, and mailed to James A. Carter, Section Chief, Hazardous Waste Section, Division of Waste Management, P.O. Box 29603, Raleigh, North Carolina 27611-9603.
- 2. Dana shall by June 21, 1997 or as otherwise indicated take the following actions to correct all violations as stated in this Short Form Compliance Order with Adminstrative Penalty and otherwise be in compliance with 40 CFR 262, codified at 15A NCAC 13A .0107:
 - A. Comply with 40 CFR 262.11, codified at 15A NCAC 13A .0107. Dana shall determine if the material in one 55-gallon container, noted during the inspection, is a hazardous waste. Sent off as a Hazardous waste.
 - B. Comply with 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107. Dana shall comply with the requirements of Subpart I in 40 CFR 265. Specifically:
 - 1. Dana shall ensure that containers holding hazardous waste are closed during storage, except when it is necessary to add or remove waste as required by 40 CFR 265.173(a), codified at 15A NCAC 13A .0110.
 - 2. Dana shall ensure that weekly inspections on containers of hazardous waste are conducted and documented as required by 40 CFR 265.174 and 15A NCAC 13A .0110(i), codified at 15A NCAC 13A .0110. In Compliance
 - 3. Dana shall maintain inspection records in accordance with 15A NCAC 13A .0110(i). In large, we

- C. Comply with 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107. Dana shall clearly mark and make visible for inspection, on each container, the date upon which each period of accumulation began.
- D. Comply with 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107. Dana shall clearly label or mark each hazardous waste container with the words, "Hazardous Waste." Ju Complime
- E. Comply with 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107. Dana shall comply with the requirements of 40 CFR 265.16, codified at 15A NCAC 13A .0110. Specifically:
 - 1. Develop a training program for their employees on hazardous waste management as required by 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110.
 - 2. Ensure that facility personnel is provided with an annual review of their initial hazardous waste training as required by 40 CFR 265.16(c), codified at 15A NCAC 13A .0110. March 26, 1117 Flms,
 - 3. Maintain the following documents and records at the facility, as required by 40 CFR 265.16(d), codified at 15A NCAC 13A .0110:
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job, as required by 40 CFR 265.16(d)(1); The Jab titles: Total factorium whole Apolt. Tech.
 - (2) A written job description for each position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(2);
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(3); Fins planned
 - (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel, as required by 40 CFR 265.16(d)(4).
 - 4. Dana shall ensure that a copy of its contingency plan and all revisions to the plan are submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services, as required by 40 CFR 265.53(b) (Subpart D), codified at 15A NCAC 13A .0110. Need to continue Efforts between responses
 - 5. Dana shall ensure that the contingency plan is immediately amended to reflect changes in the emergency coordinators as required by 40 CFR 265.54, codified at 15A NCAC 13A .0110. In Compliance

FACILITY has transmy documents in different arous. Next to consolidate material in Terining

F. Comply with 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0112. Dana shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

If the requirements above are not met, additional enforcement action including injunctive relief may be obtained for continued violations of the hazardous waste law or regulations.

Dana has the right to appeal this Compliance Order with Administrative Penalty as described in the attached NOTICE OF RIGHTS document.

If you have any questions concerning this matter, you should contact Dan Bius at (919) 733-2178 extension 220.

Respectfully,

William L. Meyer

Waste Management Division

cc: Central File

Joseph Parker Doug Holyfield

Keith Masters Pat Williamson

Mecklenburg County Health Director

Diane Long

Attorney General Staff

Jeaneanne Gettle, EPA Region 4

NOTICE OF RIGHT TO APPEAL

Dana has the right to an appeal to contest any matter of law, material fact, requirement, or penalty set forth in this Compliance Order with Administrative Penalty. To appeal this Compliance Order, Dana must file a written petition for a contested case hearing with the Office of Administrative Hearings, P.O. Drawer 27447, Raleigh, North Carolina 27611-7447, within 30 days of receipt of the Compliance Order with Administrative Penalty. The telephone is number (919) 733-0926 For purposes of computing the time limit for filing a petition for a contested case hearing, the Compliance Order will be deemed received on the date it is received by Dana's registered agent. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to Richard B. Whisnant, Process Agent for the Department of Environment, Health and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27604.

The petition for a contested case hearing must be in accordance with N.C. Gen. Stat. 150B-23(a), and must state facts tending to establish that the Division has deprived the petitioner of property, has ordered the petitioner to pay a fine or civil penalty, or has otherwise substantially prejudiced the petitioner's rights and that the Division:

- 1. Exceeded its authority or jurisdiction;
- 2. Acted erroneously:
- 3. Failed to use proper procedure;
- 4. Acted arbitrarily or capriciously; or
- 5. Failed to act as required by law or rule.

The petition must be signed by you or your representative and must be filed with a certificate of service stating that a copy of the petition was served on the Division through its process agent. The hearing will be conducted in accordance with Chapter 150B of the North Carolina General Statutes and the Rules of the Office of Administrative Hearings, a copy of which may be obtained from the Office of Administrative Hearings.

If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment, Health, and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty.

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE DANA, OF THE NEED TO FILE A WRITTEN PETITION FOR A CONTESTED CASE HEARING WITH THE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 30 DAYS OF RECEIPT OF THIS COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY IF A HEARING IS DESIRED.

William L. Meyer, Director Division of Solid Waste Management

DATE: 5/21/97

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order with Administrative Penalty to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, return receipt requested, postage prepaid) in an envelope addressed to:

Mr. Robert Hayes Dana Transport, Inc. 7254 Mt. Holly Road Charlotte, North Carolina 28214

Dated this 21^{5t} day of 1997

William L. Meyer, Director

Division of Solid Waste Management

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

	D: <u>Dana Transport, Inc.</u> ion Violated: <u>40 CFR 262,11</u>
Part I. I 1. 2. 3.	Degree or Extent of Harm (actual or potential) Quantity of waste involved One (1) fifty-five gallon drum Toxicity of waste involved unknown. Is human life or health potentially threatened? yes X no Distance to residences unknown Number of people involved 15 employees Media for exposure: air X groundwater X surface water X direct contact X Are other organisms potentially threatened? yes X no Media for exposure: air X ground water X surface water X direct contact X
5.	Are any environmental media potentially threatened? yes X no air X groundwater X surface water X soil X
6.	Is the regulatory program adversely affected? yes X_no
	Part II. Deviation from Regulations gree of noncompliance with overall regulations: stantial X significant in compliance except for cited violation
Deviation	on cell: Major X Moderate_ Minor_
Remark waste.	s: 40 CFR 262.11 states that a hazardous waste generator must determine if its solid waste is a hazardous
MATRI	X CELL RANGE: \$1,100.00 to \$ 5,500.00 Penalty amount chosen: \$ 5,500.00 Per Day Assessment:

Remarks: \$5,500.00 was chosen as the penalty amount due to the potential adverse effects Dana is imposing on the health of its employees and environment by not performing an adequate hazardous waste determination on its solid waste.

Part III. Penalty Adjustment (optional)

		Percentage change	Dollar Amount
1.	Good faith efforts to comply/ lack of good faith:		
2.	Degree of willfulness/neglect:		
3.	History of noncompliance/ compliance:		
4.	Other unique factors:		
5.		und 11	¢ E E00 00
	Adjusted initial penalty (amount from Pa		\$ _5,500.00
6.	Adjusted per-day penalty (amount from	Part II)	
7.	Number of days of violation		
8.	Multi-day penalty (line 6 x line 7)		
9.	Economic benefit of noncompliance (att worksheet)	ach separate	
10.	Total (lines 5 + 8 + 9)		
11.	Ability to pay adjustment		
12.	Total Penalty Amount:	:	\$ 5,550.00
	(may not exceed \$27,500 per day of vid		
Remar		·	
Compl	iance History:		
-	11 Jelian & Men	Date: 5/21/6	97.

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: Dana Transport, Inc.

Regulation Violated: 40 CFR 262.34(a)(1)(i)

Part I. Degree or Extent of Harm (actu	al or potential)
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- 1. Quantity of waste involved One (1) fifty-five gallon container used for storage accumulation and twelve (12) fifty-five gallon containers.
- 2. Toxicity of waste involved <u>D001 and D008(causes kidney disease</u>, anemia and hypotension).
- 3. Is human life or health potentially threatened? yes X no ___

Distance to residences unknown

Number of people involved ___15 employees_

Media for exposure: air X groundwater X surface water X direct contact X

4. Are other organisms potentially threatened? yes X no __

Media for exposure: air X ground water X surface water X direct contact X

5. Are any environmental media potentially threatened? yes X no___ air X groundwater X surface water X soil X

6. Is the regulatory program adversely affected? yes X no ____

Harm Cell: Major X Moderate _ Minor _

Remarks: One open container of ignitable hazardous waste was found in the container storage area. In addition, no weekly inspections were being conducted in the hazardous waste storage area.

Part II. Deviation from Regulations

1. Degree of noncompliance with overall regulations:

substantial ___ significant _X_ in compliance except for cited violation

Deviation cell:

Major __ Moderate_X_ Minor__

Remarks: 40 CFR 262.34(a)(1)(i) referenced by 265.173(a) and 174 state that a container of hazardous waste must be closed during storage and requires owners/operators to inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

MATRIX CELL RANGE:

\$1,100,00 to \$ 5,500,00

Penalty amount chosen:

\$ 5,500.00

Per Day Assessment:

Remarks: \$5,500.00 was chosen as the penalty amount due to the potential adverse effects Dana is imposing on the health of its employees and environment by not keeping ignitable waste containers closed and not performing weekly inspections and maintaining records.

Part III. Penalty Adjustment (optional)

		Percentage change	Dollar Amount
1.	Good faith efforts to comply/ lack of good faith:	· · · · · · · · · · · · · · · · · · ·	
2.	Degree of willfulness/neglect:		
3.	History of noncompliance/ compliance:		
4.	Other unique factors:	<u></u>	<u></u>
5.	Adjusted initial penalty (amount from Pa	rt II	\$ _5,500.00_
6.	Adjusted per-day penalty (amount from I		
7.	Number of days of violation	•	
8.	Multi-day penalty (line 6 x line 7)		<u> </u>
9.	Economic benefit of noncompliance (attaworksheet)	ach separate	·
10.	Total (lines 5 + 8 + 9)		_
11.	Ability to pay adjustment		
12.	Total Penalty Amount:	:	\$ 5,500,00
	(may not exceed \$27,500 per day of vic	olation)	
Remar			
Compl	liance _\ Hjistory:		
Signer	1. William & Menn	Date: 5/2//	97

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Penalty amount chosen: Per Day Assessment:

Name/ID: <u>Dana Transport</u>, <u>Inc.</u> Regulation Violated: <u>40 CFR 262.34(a)2 and a(3)</u>

Part I.	Degree or Extent of Harm (actual or potential)
1.	Quantity of waste involved Tweleve (12) fifty-five gallon containers
2.	Toxicity of waste involved D001 and D008(causes kidney disease, anemia and hypotension).
3.	Is human life or health potentially threatened? yes X no
	Distance to residences unknown
	Number of people involved 15 employees
	Media for exposure: air X groundwater X surface water X direct contact X
4.	Are other organisms potentially threatened? yes X no
••	Media for exposure: air X ground water X surface water X direct contact X
5.	Are any environmental media potentially threatened? yes X no_
	air X groundwater X surface water X soil X
6.	Is the regulatory program adversely affected? yes X no
	Cell: Major_X
	s: Dana stored twelve containers of D001 and D008 waste without having an accumulation date and
	with the words "Hazardous Waste." Dana has significantly increased the potential for harm to human
	and the environment by not labeling and dating each container of hazardous waste, so that anyone who
	in contact with the container knows that it contains hazardous waste.
	Part II. Deviation from Regulations
1.	Degree of noncompliance with overall regulations:
• •	substantial X significant in compliance except for cited violation
Deviat	on cell: Major_X_ Moderate Minor
Remar	ks: <u>262.34(a)(2) and (3) requires a generator to clearly label each container of hazardous waste with the</u>
	"Hazardous Waste" and the accumulation start date.
MATR	X CELL RANGE 1,100.00 to \$ 5.500.00

Remarks \$5,500.00 was chosen as the penalty amount due to the potential adverse effects Dana is imposing on its employees and the environment by not adequately labeling containers of hazardous waste. Emergency response personnel may not be aware of the hazards involved on-site.

\$ 5,500.00

Part III. Penalty Adjustment (optional)

		Percentage change	Dollar Amount
1.	Good faith efforts to comply/ lack of good faith:		<u>:</u>
2.	Degree of willfulness/neglect:		
3.	History of noncompliance/		
	compliance:		
4.	Other unique factors:		
4. 5.	Adjusted initial penalty (amount from Pa	rt II	\$ <u>5,500.00</u>
6.	Adjusted per-day penalty (amount from I		
7.	Number of days of violation		
8.	Multi-day penalty (line 6 x line 7)		·
9.	Economic benefit of noncompliance (attaworksheet)	ach separate	
10.	Total (lines 5 + 8 + 9)		
	Ability to pay adjustment		
12.	Total Penalty Amount:		\$ <u>5.550.00</u>
	(may not exceed \$27,500 per day of vio	olation)	•
Rema	ırks:		
Comp	oliance History:		
	or The Millian AMien	Date: 5/2//	97

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PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: Dana Tansport Inc. NCD 074 505 850

Regulation Violated: 40 CFR 262.34(a)(4) codified at 15A NCAC 13A .0107

Part I	l. I	Degree	or	Extent	of	Harm	(actual	or	potential)
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1. Quantity of waste involved <u>Twelve (12)fifty-five gallon containers</u>

2. Toxicity of waste involved <u>D001 and D008(causes kidney disease, anemia and hypotension).</u>

3. Is human life or health potentially threatened? yes X no ___
Distance to residences unknown
Number of people involved ___15 employees_

Media for exposure: air X groundwater X surface water X direct contact X

4. Are other organisms potentially threatened? yes X no ___

Media for exposure: air X ground water X surface water X direct contact X

5. Are any environmental media potentially threatened? yes X no air X groundwater X surface water X soil X

Is the regulatory program adversely affected? yes X no ____

Harm Cell: Major_X_ Moderate__ Minor____

Remarks: Dana failed to develop a training program for their employees on hazardous waste management. Employees did not take part initially nor in an annual review of hazardous waste training as required. The facility could not produce records of job titles related to the handling of hazardous waste and written job descriptions for each position. Dana could not produce a written description of the type and the amount of both introductory and continuing training that would be given to each person filling a hazardous waste position and finally could not produce records to document that training or job experience required had been given to and completed by facility personnel. The inspector also noted that a revised list of emergency coordinators was not sent to the local police, fire department etc. In addition, the facility failed to amend its contingency plan to reflect a change in emergency coordinators.

Part II. Deviation from Regulations

 Degree of noncompliance with overall regulations: substantial X significant in compliance except for cited violation

Deviation cell: Major X Moderate Minor

Remarks: 40 CFR 262.34(a) requires a generator to comply with Subparts C & D and 265.16. 265.16(a)(1) requires a generator to provide a training program in hazardous waste management, 265.16(c) requires a generator to annually train its employees to ensure they perform their duties and 265.16(d) requires a generator to comply with all training requirements and Subpart D contains the contingency plan requirements.

MATRIX CELL RANGE Penalty amount chosen: Per Day Assessment: 1,100.00 to \$ 5,500.00 \$ 5,500.00

Remarks \$ 5,500.00 was chosen as the penalty amount due to the potential adverse health and environmental effects Dana is imposing on the health of its employees and the environment by not properly training employees, documenting job descriptions for employees managing hazardous waste, and failing to update the contingency plan and distribute it to local response agencies.

Part III. Penalty Adjustment (optional)

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: <u>Dana Transport. Inc.</u> Regulation Violated: <u>40 CFR 268.7(a)(7)</u>
Part I. Degree or Extent of Harm (actual or potential)
1. Quantity of waste involved <u>Tweleve (12) fifty-five gallon containers</u>
2. Toxicity of waste involved D001 and D008(causes kidney disease, anemia and hypotension).
3. Is human life or health potentially threatened? yes X no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air X groundwater X surface water X direct contact X
4. Are other organisms potentially threatened? yes X no
Media for exposure: air X ground water X surface water X direct contact X
5. Are any environmental media potentially threatened? yes X no
air X groundwater X surface water X soil X
6. Is the regulatory program adversely affected? yes X no
Harm Cell: Major Moderate_X Minor
Remarks: Dana did not maintain Land disposal Restriction notices for manifest document numbers 08296 and
08396 dated August 8, 1996 and November 5, 1996, respectively for at least five years.
Part II. Deviation from Regulations
1. Degree of noncompliance with overall regulations:
substantial significant_X in compliance except for cited violation
Deviation cell: Major_ Moderate_X_ Minor
Remarks: 40 CFR 268.7(a)(7) requires generators to retain an on-site copy of all notices, certifications,
demonstrations, waste analysis data, analysis data, and other documentation produced pursuant to the Land
Disposal Restriction for five (5) years.
MATRIX CELL RANGE 275.00 to \$ 1,760.00
Penalty amount chosen: \$1,760.00

Remarks \$1,760.00 was chosen as the penalty because without approriate records it cannot be determined whether Dana characterized and managed its waste properly to minimize hazards to its employees and the environment.

Penalty amount chosen: Per Day Assessment:

Part III. Penalty Adjustment (optional)

		Percentage change	Dollar Amount
1.	Good faith efforts to comply/ lack of good faith:		
2.	Degree of willfulness/neglect:		
3.	History of noncompliance/		 -
	compliance:		
4.	Other unique factors:		
5.	Adjusted initial penalty (amount from Par	rt II	\$ <u>1,760.00</u>
6.	Adjusted per-day penalty (amount from F		-
7.	Number of days of violation	•	
8.	Multi-day penalty (line 6 x line 7)		
9.	Economic benefit of noncompliance (attaworksheet)	ach separate	
10.	Total (lines 5 + 8 + 9)		
11.	Ability to pay adjustment		
12.	Total Penalty Amount:	Ś	1,760.00
	(may not exceed \$27,500 per day of vio	lation)	17700.00
Remai		idioni	
	liance History :		
Signe	d: William & Meyer	Date: 5/27/	197

PENALTY COMPUTATION CHECKLIST

Paci:	lity Name/ID: DANA TRANSPORT, INC. NCD 074 505 850
addri	ESS: 7254 MT. HOLLY RD. CHARLOTTE, N.C. 28214
1.	Number of employees at the facility
2. 3.	Number of residents in the area of the facility, <u>UNKNOWN</u> PACILITY 10 CATED Distance to residents. <u>UNKNOWN; IN AN INDUSTRIAL SERING</u>
4.	Source of facility's potable water supply. MUNICIPAL
5.	Source of potable water supply for residents and/or other industries in the area of the facility. Municipal.
6. (A)	List all violations found at the facility: 40 CFR 262.11
(B)	40 CFR 262.34(a)(1)(i) ref to 40 CFR 265.173(a) (and)40 CFR 265.174 (qnd)15 A XCAC 13 A .0011
(c)	40 CFR 262.34(a)(2) (D) 40 CFR 262.34(a)(3)
(E)	40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1) - and-40 CFR26516 (c)-and-
	40 CFR 265.16(d)(1)(2)(3)(4)
(F)	40 CFR 262.34(a)(4) ref. Subpart C 40CFR 265.31-and-40CFR 265.35
(G)	40 CFR 262.34(a)(4) res. Subpart D 40 CFR 265.53(b) - and - 40 CFR 265.54
(H)	40 CFR 268.7(a)(7)

(OVER)

SPECIFIC VIOLATION(S)

Reg	rulation violated: 40 CFR 162.11
1.	Unit(s) involved. (1) foto fifty-five gallar confainces holding unknown Material
2.	Type of waste (waste code and constituents) unknown - Possible
	harardous waste
3.	Quantity of waste unknown - At most 110 gallans of Material
4.	Describe area in which yiolation occured The file free saffon Confamen
	in the tank Washing Appen Noted as being "deprensen" and (1) Efty five gation container
	IN AM TOTE WAShing Argu Noted as MANING FRASH IN IT.
5.	Specifics of violation. BESTATHE CACILLY NEEDS to defermine if the moterial
	IN full SEPARATE 55 gallon conformers, noted during the inspection, 15 9 GAZArdons WASTE
6.	Readily observable evidence indicating this violation may have
	impacted the environment(e.g. discolored soil, odors, etc.)
	Inchunes taken
	·
7.	Date violation occurred? JAN. 28 1987
8.	Has facility been cited for this violation in past? yes_ no
	Date(s) of past violation?
	
_	ulation violated: 40CFR 262.34(a)(1) def. 40CFR 265.173(a) 40CFR 265.774 154NCACI3
_	ulation violated: YUCTK COC. 14/AVC/Wet. YUCTF 765.173(4) YUCTK COS.774 154NCACIS
1.	Unit (B) involved. OPEN CONTAMER - SAT. ACCUMULATON CONTAINER, WEEKLY INTOGEN - All t
2.	
_	D001, D008
3.	Quantity of waste 1-55 gs/lin Container used for SAT. Accum. and 12-55 gallon Containers in 5th
4.	Describe area in which violation occured. OPEN Confaince was Not
	in the Satellite Accumulation area and No weekly inspections were bunk
_	conducted an containers of harridous waste in storage
5.	Specifics, of violation. BREN Confainer and weekly inspectant
_	ON hALANDONS WASTE CONTAINERS IN STORAGE
6.	Readily observable evidence indicating this violation may have
	impacted the environment (e.g. discolored soil, odors, etc.)
	Pictuels - NO documentation could be provided as far as weekly inspections
7	Date violation occurred? JAN. 28, 1997
7. 8.	Has facility been cited for this violation in past? yes_ no
•	Date(s) of past violation?
	Annala, as know assesses.
Rec	ulation violated: 40 CFR 262.34(a)(2)
1.	Unit (8) involved. 12-55 gallon containes holding hazardous what in sporte
2.	Type of waste (waste code and constituents)
-•	Doo! Doos
3.	Quantity of waste 12-55 gallow Confainces
4.	Describe area in which violation occured. Both Storage AREAS -
₩.	TANK / legning Area and the Tote Washing Area
	THE VICTORIAN PRO THE VICTORIAN PERSON
5.	
J •	Energian of ministion Market waste contained in choose where
	Specifics of violation. Harridons waste continues in storage were
E	NOT MARKED WITH AN ACCUMULATION START DATE.
6.	NOT MAKED WITH AN ACCUMULATION START DATE. Readily observable evidence indicating this violation may have
6.	NOT MARKED With GN accumulation start Date. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
6.	NOT MAKED WITH GN accumulation start Date. Readily observable evidence indicating this violation may have
	Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) Fifults to downest violation
7.	Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) Fictures to document scolation Date violation occurred? San. 28,1997
	Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) Fifures to document violation

	SPECIFIC VIOLATION(S)
Bac	rulation violated: 40 CFR 262,34(a)(3)
1.	Unit (8) involved. 1-55 gallow contained used for safell-te accumulation
2.	Type of waste (waste code and constituents) <u>D001. D008</u>
	. The or habee (habee over the constitution)
3.	Quantity of waste 1-55 gallow container - Not full
4.	Describe area in which violation occured. The container was ablad
	in the Safellite Accumulation area in the TANK Cleaning portion of the
	Cacility
5.	Specifics of violation. ONE fifty-five golden confirmen used for Satellite
_	Accumulation, with Noted as Not being marked or labeled clearly with words "HARRIGALLE W
6.	Readily observable evidence indicating this violation may have
	impacted the environment(e.g. discolored soil, odors, etc.) Pictures of the Violation
	MUTATES OF THE DISTRICTS
7.	Date violation occurred? JAN. 28,1997
8.	Has facility been cited for this violation in past? yes no
	Date(s) of past violation?
_	40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1) and 40 CFR 265.16(c)
_	ulation violated: and 40 CFR 265.16 (d)(1)(2\forall s)(4)
1.	Unit(s) involved. <u>PERSONNEL TRAINING</u>
2.	Type of waste (waste code and constituents) Dool, Doo8
3.	Quantity of waste
4.	Describe area in which violation occured. PERSONNEL TRAINING
- •	DOCUMENTATION
5.	Specifics of violation. FACILITY failed to develop a training program
	IN the area of MAZArdows Waste MANAGEMENT
6.	Readily observable evidence indicating this violation may have
	impacted the environment (e.g. discolored soil, odors, etc.)
	No documentation could be provided by the company regarding personnel
7.	HAINING ON NATAROBUS WASTE MANAGEMENT. Date violation occurred? JAN. 28,1997
8.	Has facility been cited for this violation in past? yes no
J .	Date(s) of past violation?
_	ulation violated: 40 CFR 262.34(a)(4) ref. Subpart C-40 CFR 265.31 and 40 CFR
1.	Unit (8) involved. Refuses of HAZARDOUS WASTE and gible space for containers o
2.	Type of waste (waste code and constituents)
•	Doo1, Doog
3.	Quantity of waste
4.	Describe area in which violation occured. RELEASES of HARACONS WASTE WASTE ON the side of 5 sallow Paul located in the TOTE WASTING AREA.
	AN INSUfficient amount of aisle space was noted in container storage in both areas
5.	Specifics of violation. Facility failed to minimize the possibility of A
┛.	celease of hazardous waste and the Edulity failed to provide a sufficient amount of
6.	Readily observable evidence indicating this violation may have
- •	impacted the environment (e.g. discolored soil, odors, etc.)
	Pictures on both violations
7.	Date violation occurred? JAN. 28,1997
8.	Has facility been cited for this violation in past? yes_ no
	Date(s) of past violation?

SPECIFIC VIOLATION(S)

legu L	Unit(s) involved. Confusercy Plan
2.	Type of waste (waste code and constituents)
١.	Quantity of waste
	Describe area in which violation occured. Contingency Plan documentation
5.	Specifics of violation. The facility failed to amend their centingency land and send the revised copies to local agencies and STATE Agencies.
•	Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) No documentation could be provided by the company in reference to are amounted
	Date violation occurred?
.egu	lation violated: 40 CFR 368.7(a)(7) Unit(s) involved. LAND DISPOSAL NOTIFICATION
•	Type of waste (waste code and constituents) Dool, Doos
•	Quantity of waste Describe area in which violation occured. Manifest Documendation
•	Specifics of violation. The facility failed to retain on-site copies
•	Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) Diens the paperwork And it the facility could not povide copies of
	CERTAIN LDR Notification for certain Hazardous WASTE MANIFESTS. Date violation occurred? JAN. 28,1997
•	Has facility been cited for this violation in past? yes no Date(s) of past violation?
	7-14
.egu	lation violated:
•	Type of waste (waste code and constituents)
•	Quantity of waste
•	Describe area in which violation occured.
.•	
	Specifics of violation. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
•	Specifics of violation. Readily observable evidence indicating this violation may have

RCRIS

EPA ID #: NCD 074 505 850

FACILITY NAME: Dana Transport, Inc.

CITY: Charlotte, N.C.

EVALUATION DATA:

NEW: X CHANGE:

DELETE:

PERSON: 029

BRANCH: 01

AGENCY: STATE

REASON: 01

SUPERVISOR NOV TRACKING INFO

TYPE: CEI

INITIAL INSPECTION DATE: January 28, 1997

DOCKET: 97-REINSP DATE:

COMMENTS: Compliance order with Administrative Penalty

GENERATORS:

GBF: GER: GGR:X GLB:X GMR:X GOR: GPT:X GRR:X GSC: GSQ:

TRANSPORTERS:

TGR: TMR: TOR: TRR: TWD:

TSD's

DBF: DCH: DCL: DFR: DGS: DGW: DIN: DLB: DLF: DLT: DMC:

DMR: DOR: DOT: DPB: DPP: DSI: DTR: DTT: DWP:

USED OIL:

TUO: TFO: BUO: MUO: PUO: RUO:

VIOLATION DATA: New:X Change: Delete:

1. Agency: State Type: GGR

Date Determined: 1-28-97

Class: 1

Priority:

Seg#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.11

Comment: Waste determination needed on two, fifty-five gallon containers noted during the inspection

2. Agency: State Type:GPT Date Determined:1-28-97

Class: 1

Priority:

Seq.#

Returned to Compliance:

Actual Date:

Reg. Description: 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.173(a)

Comment: Facility failed to keep a container used for accumulating hazardous waste closed during storage.

3. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174

Comment: Facility failed to retain records of required inspections on containers of hazardous waste in storage.

4. Agency: State Type:GPT Date Determined:1-28-97
Class: 1 Priority: Seq#

Class: 1 Priority: Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(2)

Comment: Facility failed to mark 12-55 gallon containers holding hazardous waste with

accumulation start date

5. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(3)

Comment: Facility failed to label one container holding hazardous waste with the words

"Hazardous Waste".

6. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1)

Comment: Facility failed to develop a training program for their employees on

hazardous waste management

7. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#
Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) Comment: No annual review of hazardous waste training

8. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(1)

Comment: No job titles

9. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(2)

Comment: No written job descriptions

10. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(3)

Comment: No written descriptions of the type and amount of training

11. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(4)

Comment: No records of training

12. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.31

Comment: Failed to minimize a possibility of a release of hazardous waste

13. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.35 (Subpart C)

Comment: No aisle space

14. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.53(b)(subpart D)

Comment: Facility failed to submit copies of a revised contingency plan to local

authorities

15. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.54(subpart D)

Comment: Facility failed to immediately amend their contingency to show change in

emergency coordinators.

16. Agency: State Type:GLB Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description:40 CFR 268.7(a)(7)

Comment: Facility failed to maintain copies of LDR's

State of North Carolina Department of Environment, Health and Natural Resources Mooresville Regional Office

James B. Hunt, Jr., Governor Jonathan B. Howes, Secretary



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SHORT FORM COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY DOCKET #97-

Mr. Robert Hayes
Dana Transport, Inc.
7254 Mt. Holly Road
Charlotte, North Carolina 28214

Re: Dana Transport, Inc. NCD 074 505 850

Dear Mr. Hayes:

On December 18, 1980, the State of North Carolina, Waste Management Division ("Division"), was authorized to operate the State RCRA hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (the Act), and the rules codified at 15A NCAC 13A (the "Rules"). William L. Meyer, Division Director, has been delegated the authority to implement the Act and Rules. Based on an on-site inspection on January 27, 1997, it has been determined that Dana Transport, Inc. is in violation of certain requirements of the Act and Rules as set forth below.

- 1. Dana Transport, Inc. ("Dana Transport") generates hazardous waste as defined in N.C.G.S. 130A-290(8) and 15A NCAC 13A .0102, in Charlotte, Mecklenburg County, North Carolina. Dana Transport is a person as defined in N.C.G.S. 130A-290(22) and 15A NCAC 13A .0102.
- 2. 40 CFR Part 262, codified at 15A NCAC 13A .0107, contains standards and requirements applicable to generators of hazardous waste.
- 3. Dana Transport, Inc. is listed with the Division as a large quantity generator. A large quantity generator is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with



Section 265.16, and 40 CFR 268.7(a)(4).

- 4. Dana Transport, Inc. is located on approximately two acres of land in Charlotte, in <u>Mecklenburg Co.</u>, North Carolina. Dana Transport, Inc. is a tank cleaning operation which generates D001 and D008 hazardous waste at its facility.
- 5. On January 28, 1997, Mr. Joseph Parker, Waste Management Specialist with the Division and Mr. Jesse Wells, Waste Management Specialist with the Division conducted an inspection at Dana During the inspection, Mr. Joseph Parker Transport, Inc. conducted a paperwork audit, which included looking at all manifests generated since 1994. The audit revealed that D001 and (waste flammable and combustible liquid) wastes were generated at the facility. Both the D001 and D008 hazardous wastes are generated during the tank cleaning process. The facility cleans large tanks, which are connected to tractortrailers for over the road shipment. The facility cleans these tanks after they have been unloaded at their final destination. During the tank cleaning process, the heel of the tank is cleaned out first. The heel consists of the material residue from the product that was shipped in the tank. It is at this point that a hazardous waste or a non-hazardous waste is generated. Depending on the type of material that is cleaned out of the tanker, the facility either generates a hazardous waste or a non-hazardous This material is then containerized in fifty-five gallon containers and held for shipment to their designated TSDF.

During the inspection Mr. Joseph Parker noted that the facility was in violation of several requirements of 40 CFR 262, and other violations contained in 15A NCAC 13A specifically:

- A. 40 CFR 262.11, codified at 15A NCAC 13A .0107, states that a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:
 - a. He should first determine if the waste is excluded from regulation under 40 CFR 261.4 and 261.5.
 - b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.
 - c. If the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, he must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - (i) Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261 or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or

- (ii) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.
- d. If the waste is determined to be hazardous, the generator must refer to Parts 261, 264, 265, 266, 268 and 273 of this chapter for possible exclusions or restrictions pertaining to management of his specific waste.

Dana Transport, Inc. is in violation of 40 CFR 262.11, codified at 15A NCAC 13A .0107, in that it failed to determine if the waste generated is a hazardous waste. Specifically, one 55 gallon container located in the Tote Washing Area was noted as having trash intermingled with other unidentified solid waste. The contents of this container were not properly characterized and handled accordingly.

- B. 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and the generator complies with Subpart I of 40 CFR Part 265.
 - 1. 40 CFR 265.173(a), codified at 15A NCAC 13A .0110 states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, referenced at 40 CFR 265.173(a), codified at 15A NCAC 13A .0110 in that it failed to keep a container used for accumulating a hazardous waste closed during storage.

2. 40 CFR 265.174, codified at 15A NCAC 13A .0110 and 15A NCAC 13A.0110(i) states that a generator must keep records and results of required inspections for at least three years from the date of the inspection.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, referenced at 40 CFR 265.174, codified at 15A NCAC 13A .0110 and 15A NCAC 13A.0110(i) in that it failed to keep records and results of required inspections for at least three years from the date of the inspection.

C. 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107, states that a generator may accumulate hazardous waste on-site for

90 days or less without a permit or without having interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107 in that they failed to mark their containers holding hazardous waste with accumulation start dates. During the inspection, it was noted that twelve, fifty-five gallon containers, holding hazardous waste, were not marked with an accumulation start date while in storage.

D. 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107, states that while being accumulated on-site each container holding hazardous waste must be labeled or clearly marked with the words "Hazardous Waste".

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107, in that one 55 gallon container being used to accumulate hazardous waste in the Tank Cleaning Area was not clearly mark with the words "Hazardous Waste".

- E. 40 CFR 262.34(a) (4), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste onsite for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a) (4).
 - 1. 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110, states that facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with this program includes all the elements described in the document required under paragraph (d)(3) of this section.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, referenced at 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110, in that it failed to develop a training program for their employees on hazardous waste management.

2. 40 CFR 265.16(c), codified at 15A NCAC 13A .0110, states that facility personnel must take part in an annual review of the initial training required in paragraph (a)

of this section.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, referenced at 40 CFR 265.16(c), codified at 15A NCAC 13A .0110, in that it failed to provide facility personnel with an annual review of their initial hazardous waste training.

- 3. 40 CFR 265.16(d), codified at 15A NCAC 13A .0110, states that the owner or operator must maintain the following documents and records at the facility:
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
 - (2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section;
 - (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, in that it accumulates hazardous waste on-site for 90 days or less without a permit or without having interim status, and it did not comply with the requirements for owners and operators in Section 265.16(d). Specifically, it failed to maintain at the facility:

- (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job, as required by 40 CFR 265.16(d)(1);
- (2) A written job description for each position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(2);

- (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(3);
- (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel, as required by 40 CFR 265.16(d)(4).
- F. 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste onsite for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4).
 - 1. 40 CFR 265.31 (Subpart C), codified at 15A NCAC 13A .0110, states facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, referenced at 40 CFR 265.31 (Subpart C), codified at 15A NCAC 13A .0110, in that they failed to minimize the possibility of a release of a hazardous waste at their facility.

2. 40 CFR 265.35 (Subpart C), codified at 15A NCAC 13A .0110, states the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, referenced at 40 CFR 265.35 (Subpart C), codified at 15A NCAC 13A .0110, in that they failed to provide sufficient amount of aisle space for containers of hazardous waste in storage. Specifically, during the inspection, the inspector was unable to view containers holding hazardous waste due to the insufficient amount of aisle

space provided by the facility in their storage area.

- G. 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste onsite for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4).
 - 1. 40 CFR 265.53(b) (Subpart D), codified at 15A NCAC 13A .0110, states that a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, referenced at 40 CFR 265.53(b)(Subpart D), codified at 15A NCAC 13A .0110, in that they failed to submit copies of the facility's revised contingency plan to the local police departments, fire departments, hospitals, and State and local emergency response teams.

2. 40 CFR 265.54(Subpart D), codified at 15A NCAC 13A .0110, states the contingency plan must be reviewed, and immediately amended when the list of emergency coordinators changes.

Dana Transport, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, referenced at 40 CFR 265.54 (Subpart D), codified at 15A NCAC 13A .0110, in that the facility failed to immediately ammend its contingency plan to reflect a change in emergency coordinators.

H. 40 CFR 268.7(a) (7), codified at 15A NCAC 13A .0112, states that generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to

disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2-261.6, or exempted from Subtitle C regulation, subsequent to the point of generation.

Dana Transport, Inc. is in violation of 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0012, in that it did not retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

Specifically, Dana Transport, Inc. did not maintain Land Disposal Restriction notices for manifest document numbers 08296 dated 8/9/96 and 08396 dated 11/5/96.

ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$25,000.00 per day for each violation of the hazardous waste provisions of the Act, rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty which include the degree and extent of the harm caused by the violation and the cost of rectifying the damage. 15A NCAC 13A .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.

After	careful	cons	iderati	on of	each	of the	factors	above,	penalties
are as	ssessed	as fo	llows:	A		; B	; C.	·	_ ; D
; E	;	F		G		_; and H	I	Accor	rdingly, a
total	penalty	is i	mposed	in the	e amou	int of _	<u>-</u>		

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Dana Transport, Inc. is hereby ordered to take the following actions:

1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, payable to the Division, and mailed to James A. Carter, Section Chief, Hazardous Waste Section, Division of Solid Waste Management, P.O. Box 27687, Raleigh, North Carolina 27611-7687.

- 2. Dana Transport, Inc. shall by _______, or as otherwise indicated take the following actions to correct all violations as stated in this Compliance Order and otherwise be in compliance with 40 CFR 262, codified at 15A NCAC 13A .0107:
 - A. Comply with 40 CFR 262.11, codified at 15A NCAC 13A .0107.

 Dana Transport, Inc. shall determine if the material in two separate fifty-five gallon containers, noted during the inspection, is a hazardous waste.
 - B. Comply with 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107. Dana Transport, Inc. shall comply with the requirements of Subpart I in 40 CFR 265. Specifically:
 - 1. Dana Transport, Inc. shall ensure that containers holding hazardous waste are closed during storage, except when it is necessary to add or remove waste as required by 40 CFR 265.173(a), codified at 15A NCAC 13A .0110.
 - 2. Dana Transport, Inc. shall ensure that weekly inspections on containers of hazardous waste are conducted and documented as required by 40 CFR 265.174 and 15A NCAC 13A .0110(i), codified at 15A NCAC 13A .0110.
 - C. Comply with 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107. Dana Transport, Inc. shall clearly mark and make visible for inspection on each container, the date upon which each period of accumulation began.
 - D. Comply with 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107. Dana Transport, Inc. shall label or mark each hazardous waste container clearly with the words, "Hazardous Waste".
 - E. Comply with 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107. Dana Transport, Inc. shall comply with the requirements of 40 CFR 265.16, codified at 15A NCAC 13A .0110. Specifically Dana Transport, Inc. shall:
 - 1. Develop a training program for their employees on hazardous waste management as required by 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110.
 - 2. Ensure that facility personnel is provided with an annual review of their initial hazardous waste training as required by 40 CFR 265.16(c), codified at 15A NCAC 13A .0110.
 - 3. Maintain the following documents and records at the facility, as required by 40 CFR 265.16(d), codified at

15A NCAC 13A .0110:

- (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job, as required by 40 CFR 265.16(d)(1);
- (2) A written job description for each position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(2);
- (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(3);
- (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel, as required by 40 CFR 265.16(d)(4).
- F. Comply with 40 CFR 262.34(a) (4), codified at 15A NCAC 13A .0107. Dana Transport, Inc. shall comply with the requirements for owners and operators in Subpart C 40 CFR 265. Specifically Dana Transport, Inc. shall:
 - 1. Ensure the facility is maintained and operated in such a way to minimize the possibility of a release of a hazardous waste as required by 40 CFR 265.31 (Subpart C), codified at 15A NCAC 13A .0110.
 - 2. Ensure that a sufficient amount of aisle space is provided for containers of hazardous waste in storage as required by 40 CFR 265.35 (Subpart C), codified at 15A NCAC 13A .0110.
- G. Comply with 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107. Dana Transport, Inc. shall comply with the requirements for owners and operators in Subpart D 40 CFR 265. Specifically Dana Transport, Inc. shall:
 - 1. Provide copies of the facility's revised contingency plan to the local police departments, fire departments, hospitals, and State and local emergency response teams as required by 40 CFR 265.53(b)(Subpart D), codified at 15A NCAC 13A .0110.
 - 2. Ensure that the contingency plan is immediately ammended to reflect changes in the emergency coordinators as required by 40 CFR 265.54, codified

at 15A NCAC 13A .0110.

H. Comply with 40 CFR 268.7(a) (7), codified at 15A NCAC 13A .0112. Dana Transport, Inc. shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

If the requirements above are not met, additional enforcement action including injunctive relief may be obtained for continued violations of the hazardous waste law or regulations.

Dana Transport, Inc. has the right to appeal this Compliance Order with Administrative Penalty as described in the attached NOTICE OF RIGHTS document.

If you have any questions concerning this matter, you should contact Doug Holyfield at (910) 771-4600

Respectfully,

William L. Meyer Waste Management Division

cc: Central File
Joseph Parker
Doug Holyfield
Keith Masters
Pat Williamson
Mecklenburg County Health Director
Diane Long
Attorney General Staff
Shannon Maher, EPA, Region IV

NOTICE OF RIGHT TO APPEAL

Dana Transport, Inc. has the right to an appeal to contest any matter of law, material fact, requirement, or penalty set forth in this Compliance Order with Administrative Penalty. To appeal this Compliance Order, Dana Transport, Inc. must file a written petition for a contested case hearing with the Office of Administrative Hearings, P.O. Drawer 27447, Raleigh, North Carolina 27611-7447, within 30 days of receipt of the Compliance Order with Administrative Penalty. For purposes of computing the time limit for filing a petition for a contested case hearing, the Compliance Order will be deemed received on the date it is received by Dana Transport, Inc.'s registered agent. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to Richard B. Whisnant, Process Agent for the Department of Environment, Health and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27604.

The petition for a contested case hearing must be in accordance with N.C. Gen. Stat. 150B-23(a), and must state facts tending to establish that the Division has deprived Dana Transport of property, has ordered Dana Transport, Inc. to pay a fine or civil penalty, or has otherwise substantially prejudiced Dana Transport Inc.'s rights, and that the Division:

- 1. Exceeded its authority or jurisdiction;
- Acted erroneously;
- Failed to use proper procedure;
- 4. Acted arbitrarily or capriciously; or
- 5. Failed to act as required by law or rule.

The petition must be signed by Dana Transport, Inc. or his representative and must be filed with a certificate of service stating that a copy of the petition was served on the Division through its process agent. The hearing will be conducted in accordance with Chapter 150B of the North Carolina General Statutes and the Rules of the Office of Administrative Hearings, a copy of which may be obtained from the Office of Administrative Hearings.

If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due

within 60 days after service of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment, Health and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty.

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE ABC, OF THE NEED TO FILE A WRITTEN PETITION FOR A CONTESTED CASE HEARING WITH THE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 30 DAYS OF RECEIPT OF THIS COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY IF A HEARING IS DESIRED.

BA:_		
	William L. Meyer, Division of Solid	Director Waste Management
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CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order with Administrative Penalty to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, return receipt requested, postage prepaid) in an envelope addressed to:

Mr. Robert Hayes
Dana Transport, Inc.
7254 Mt. Holly Road
Charlotte, North Carolina 28214

Dated	this	day	of		 1996.
		William L Division			gement

RCRA INSPECTION REPORT

1. FACILITY INFORMATION

Dana Transport, Inc. 7254 Mt. Holly Road Charlotte, N.C. 28214 NCD 074505850 Generator

2. <u>FACILITY CONTACT</u>

Robert Hayes - Container Manager 704-399-3395

3. SURVEY PARTICIPANTS

Joseph Parker - DEHNR, Hazardous Waste Section Jesse Wells - DEHNR, Hazardous Waste Section Bart Massey - Meck. Co. Hazardous Materials Division Robert Hayes - Dana Transport, Inc. Bill Horvath - Dana Transport, Inc.

4. <u>DATE OF INSPECTION</u>

28 Jan 1997

5. PURPOSE OF INSPECTION 265, & 268.

To determine compliance with 40 CFR 262,

6. FACILITY DESCRIPTION

Dana Transport, Inc. is listed with the State of North Carolina as a Large Quantity Generator of hazardous waste. The facility is located on Mt. Holly Road, near the Paw Creek area of Mecklenburg Co.

Dana Transport, Inc. operates as a tanker washing facility. They transport empty tankers into their facility and clean them out to be used again. In this process, the facility first cleans out the "heel" of the tank, which is placed into 55 gallon containers. Depending on the type of material transported in the tanker, the waste could be either hazardous and non-hazardous. After the "heel" is taken out, the inside of the tanker is then cleaned with a series of degreasers, soaps, and hot water. This wastewater material is then collected in a 5000 gallon tank located onsite. Once the this tank is full, it undergoes pretreatment before it is discharged to the CMUD (Charlotte - Mecklenburg Utilities Division). The facility employs mobile tanker to hold this wastewater when the pretreatment process is occuring. Acting as a temporary holding tank for the wastewater, the tanker allows the facility to continue normal operations during the treatment process. Any wastewater that is hold in this tanker is named into process. Any wastewater that is held in this tanker is pumped into the 5000 gallon batch tank after it is emptied. The pretreatment process of this wastewater consists of using Ferric chloride to produce a physical/chemical precipitation. When this is completed, the wastewater is sent to CMUD and the sludge material left over is sent to a sludge press which is located onsite. After going through the sludge press, this material is contained in a roll-off box and sent to BFI as a non-hazardous waste. A copy of the "Generator Waste Determination Certification" will be attached to this inspection report.

7. TYPE WASTE

D001 - Most of the types of hazardous waste this facility generates are manifested as ignitable.

D008 - The facility consistently ships off a D008 waste which is marked as Ethanol.

8. AREAS OF INSPECTION

(Yes = compliance, no = violation, na = not applicable)

- Emergency Preparedness:

In the area of emergency preparedness, the facility was not in compliance with two regulations. First, the facility failed to provide a sufficient amount of aisle space for containers of hazardous waste in storage. The regulations state that "The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Second, the facility uses five gallon buckets to transfer waste "heels" to containers marked as hazardous waste. During the inspection, it was noted that one, five gallon bucket, specified by Mr. Hayes as holding hazardous waste, was open and had noticeable (picture) releases on the outside of the container. The regulations state that "Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

- Inspection Records:

The facility conducts daily inspections on tanks and containers holding material onsite. However, these inspections were not addressing, at least on paper, requirements of hazardous waste inspections. The regulations clearly state that "The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

- Contingency Plan:

The facility's Contingency Plan was found to be out of compliance. No ammendments have been made to the plan as far as new facility personnel, changes in emergency coordinators, and changes in facility contacts. The regulations state that:
"The contingency plan nust be reviewed, and immediately amended, if necessary, whenever:

(a) Applicable regulations are revised;

(b) The plan fails in an emergency;

(c) The facility changes -- in its design, construction, operation, maintenance, or other circumstances -- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

(d) The list of emergency coordinators changes; or(e) The list of emergency equipment changes."

In addition, local emergency agencies have not been notified of the changes at the facility. The regulations again clearly state that "A copy of the contingency plan and all revisions to the plan must be: (a) Maintained at the facility; and

(b) Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

- Training Records:

The facility's hazardous waste training was not in compliance with the requirements of the hazardous waste regulations. The training provided by the facility for employees focused mainly on facility operations. During the inspection, no documentation of training on subjects such as emergency procedures, use of emergency equipment, and hazardous waste regulations could be be provided by the facility. In addition, the facility could not provide documentation of employee job titles and written job descriptions of those who fill positions that work with hazardous waste.

- Manifests/LDR:

The facility failed to retain the required land disposal restriction forms for the following manifests:

1) Manifest Doc. # 08296 - 08/09/96 2) Manifest Doc. # 08396 - 11/05/96

In addition, the facility had no records of any hazardous waste shipments during the calendar year of 1995. It is the recommendation of the inspector that the generator investigate whether any shipments took place during this time.

- 90/180 day storage areas:

The facility has two areas where containers of hazardous waste are stored awaiting disposal. The first area was designated as the Tank Cleaning Area. During the inspection, it was observed that containers of hazardous waste and non-hazardous waste were stored together in this area (picture). With Mr. Hayes' assistance, five, fifty-five gallon containers were found to contain hazardous waste. Three of the containers were properly labeled and dated. The other two containers were not accessible to inspect due to the overcrowding of the other containers (picture). On the opposite side of the Tank Cleaning Area, the inspector observed one, fifty-five gallon container which was marked as a hazardous waste. However, the container did not have an accumulation start date marked on it. The regulations state that " The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container".

The other area, noted as the Tote Washing Area, also had containers of hazardous waste in storage. During the inspection, six, fifty-five gallon containers of hazardous waste were observed to be in storage. No accumulation start dates were marked on any of the containers (picture).

In addition, one, five gallon container was observed in the Tote Washing Area during the inspection. By Mr. Hayes' determination, this container held ink which is considered a hazardous waste by Dana

Transport. The container was open, not labeled as a hazardous waste, and had releases on the sides of the container (picture).

- Satellite Accumulation Area:

The facility's satellite accumulation area is located in the Tank Cleaning Area of the building. During the inspection, the inspector observed one, fifty-five gallon container being used to hold hazardous waste. The container was not marked as a hazardous waste and had to be identified as such by Mr. Hayes. The regulations state that must mark his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers (picture).

In addition, the satellite accumulation container was observed to be open at the time of the inspection. The regulation state that "a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste (picture).

- External facility condition:

The following three observations were noted during the walk through portion of the inspection:

- 1) The facility had numerous empty containers stored on the property. Mr. Hayes told us that many of the containers were being held to be sold to a container recycler in the Charlotte area. Our recommendation was that he mark off a specific place on his property to store these containers in an orderly fashion.
- 2) Behind the facility, near the pretreatment room, the facility has an aboveground tank that holds No. 2 fuel oil. A cinder block containment wall has been constructed around the tank. During the walk through, the inspector observed approximately 4 to 6 inches of material inside the containment. The material appeared to have yellowish/green coloration to it. It was also observed that around the base of the containment wall, on the outside, that this same yellowish/green coloration had stained the grass (picture). I have relayed this information to the Mecklenburg Co. Environmental Protection and State Division of Water Quality personnel to address this situation. The contacts made with the Mecklenburg Co. and State agencies are Mr. Steve Jadlocki and Mr. Landon Davidson, respectively.
- 3) Adjacent to the fuel oil tank, was an in-ground oil/water separator (picture). The inspector observed the unit to have black residues, assumed to be oil, on the ground surrounding the cover. This matter has also been referred to the above mentioned contacts for Mecklenburg Co. and the State of N.C.

- Other HW units:

The following items do not necessarily pertain to the title of other hazardous waste units, but are put here to addressed accordingly.

During the inspection, two containers were noted as needing waste determinations. The first, a fifty-five gallon container, was observed in the Tank Cleaning Area of the facility. The label above

the container specified that it held a type of degreaser (picture). Mr. Hayes said they no longer use this material and that it should sent off for disposal. When questioned about the type of material this container held, Mr. Hayes was unable to tell us whether it was hazardous or non-hazardous. The inspector informed Mr. Hayes that he would need to perform a waste determination on what this material was and have it disposed of accordingly.

The second container was found in the Tote Washing Area. The container in question was a fifty-five gallon container which held trash and other debris picked up from the washing area. The container was approximately 1/3 full and had solvent smell eminating from it (picture). Mr. Hayes informed us that no hazardous waste was supposed to be put in this container. The inspector informed Mr. Hayes that he will need to perform a waste determination on the contents of the container and have it disposed of accordingly.

- Recomendations: None

9. Waste Minimization

The facility failed to develop a written waste minimization plan for hazardous waste generation. The facility needs to develop this type of plan which specifies the steps Dana Transport, Inc. are taking to reduce their hazardous waste generation.

10. SITE DEFICIENCIES:

Facility not in compliance

The following violations were noted during the inspection:

1) 40 CFR 262.11 - Hazardous Waste Determination
The facility needs perform a waste determination on two containers
that were observed during the inspection. The first container, noted
in the Tank Washing Area as "degreaser" needs to be profiled and
disposed of since the facility no longer uses this type of material in
its operation.

The second fifty-five gallon container was noted in the Tote Washing Area as being a trash drum. However, the material inside the container gave off a solvent type smell. This material needs to be properly characterized and disposed of accordingly.

- 2) 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174 Weekly Inspections
 The facility needs to start performing weekly inspections on
 containers of hazardous waste in storage.
- 3) 40 CFR 262.34(a)(2) Accumulation Start Dates
 The facility needs to start marking all containers of hazardous
 waste in storage with accumulation start dates. Twelve, fifty-five
 gallon containers holding hazardous waste were noted during the

inspection as not having accumulation start dates marked on them.

- 4) 40 CFR 262.34(a)(3) Hazardous Waste Labels
 The facility needs to ensure that all containers of hazardous
 waste in storage are labeled with the words "Hazardous Waste". During
 the inspection, one five gallon container noted as holding hazardous
 waste was not labeled as a hazardous waste.
- 5) 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1)(2)(3) Personnel Training

The facility needs to have program of training that is specific to hazardous waste. The instructor for this program must be directed by a person trained in hazardous waste management regulations. The program should include, but not be limited to, contingency plan implementation, emergency procedures, and emergency equipment.

6) 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) - Personnel Training Annual

Review

Facility personnel must take part in an annual review of the required initial training.

- 7) 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(1)(2)(3)(4) Required Training Documents and Records
 The facility must maintain the following documents and records at the facility:
- (1) 40 CFR 265.16(d)(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job
- (2) 40 CFR 265.16(d)(2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.
- (3) 40 CFR 265.16(d)(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section.
- (4) 40 CFR 265.16(d)(4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.
- 8) 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(e) Past Training Records
 The facility must keep all training records on current personnel
 until closure of the facility. In addition, training records of
 former personnel must be kept onsite for three years from the date the
 employee last worked at the facility.

9) 40 CFR 262.34(a)(4) ref. 40 CFR 265.31 - Releases of Hazardous Waste

The facility failed to minimize the possibility of a release of hazardous waste to the environment. During the inspection, one - five gallon container, holding hazardous waste, was noted as having releases on the sides of the container.

- 10) 40 CFR 262.34(a)(4) ref. 40 CFR 265.35 Required Aisle Space
 The facility failed to provide a sufficient amount of aisle space
 between hazardous waste containers in storage. During the inspection,
 both hazardous waste storage areas (Tank Cleaning Area and Tote
 Washing Area) were noted as not having any aisle space.
- 11) 40 CFR 262.34(a)(4) ref. 40 CFR 265.53(b) Copies of Contingency Plan

A copy of the facility's contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. During a recent incident which involved a non-hazardous wastewater discharge, the information held by the local fire department was incorrect and out dated. This information pertained to emergency contacts for the facility.

12) 40 CFR 262.34(a)(4) ref. 40 CFR 265.54(c)(d) - Amendment to Contingency Plan

The facility's contingency plan must be reviewed, and immediately

amended, if necessary, whenever the following occurs:

(c) The facility changes -- in its design, construction, operation, maintenance, or other circumstances -- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.

(d) The list of emergency coordinators changes.

During the inspection, inspectors reviewed the facility's contingency plan and noted that revisions have not been made to include the addition of the temporary tank used in the pretreatment process. The facility also failed to designate personnel as emergency coordinators. The personnel named in the existing contingency plan as emergency coordinators no longer are employed at the facility. The current facility contact was hired in April of 1996. We assume the facility has been conducting operations since last April without these revisions.

- 13) 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a) Open Containers
 The facility needs to ensure that all containers used for
 satellite accumulation are closed when not adding or removing waste.
 During the inspection, it was noted that one, fifty-five gallon
 container, used for satellite accumulation was observed open.
- 14) 40 CFR 262.34(c)(1)(ii) Container Labeling
 The facility needs to ensure that all containers used for
 satellite accumulation are marked with the words "Hazardous Waste" or

with other words that identify the contents of the containers. During the inspection, it was noted that one, fifty-five gallon container, used for satellite accumulation, was not marked as a hazardous waste.

15) 40 CFR 268.7(a)(7) - LDR Notification
As a generator of hazardous waste, the facility must retain a copy of all Land Disposal Restriction notices for at least five years from the date the waste was sent to their designated TSD. During the inspection, it was noted that the facility failed to retain the required LDR notices for Manifests: #08296 - 8/9/96, and #08396 - 11/5/96.

C) Yankur A-UMS

FER 21 1997

ERTIFIED MAIC)
FACILITY CONTACT

RCRA INSPECTION REPORT

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(x= violation, na= not applicable)

	Ochera miormation.		
	Facility Name DANA TRANSPORT INC		· · · · · · · · · · · · · · · · · · ·
	Location 7254 MT MOLLY ROAD C	CHARLOTTE, N.C. 28214	
•	Mailing Address		
	EPA I.D.# <i>NCD 074505850</i>	Phone # 104 - 399 - 3395	
	Contact/ Title ROBERT HAYES- CONTAINER		
	Inspection Date JAMARY 28 1997	Last Inspection FERMARY 19	1.1993
	Status <u>/ Û</u> b	Type of Inspection CFI	-
	Waste Management Specialist(s) JOSEPH F	- • • • • • • • • • • • • • • • • • • •	-
	Present at Inspection Robert Hays - Contain		Bill Horish
	Type of Business TANKER WHSHING FAC	Estely,	75.10
	Waste Generated Dool Food Doo8		
			
	Manisests:		
	Approved Transporters? YES	Approved TSD's? 1/8 5	
	Signed Copies? YES	Filled Out Correctly? YE	5
مه.	LDR Notification Attached? NO - Z. H. W.		
, "	DDICTION Philadical Type Philade	Jillian S	
			
⇒	Waste Minimization? How? No ul	PRITTEN PLAN ONSITE	<u> </u>
21	Waste William attorn	William Louis Provide	····
			
			
	Hazardous Waste Inspection Records:		
	Inspections On Storage Area NO INSPECTIONS	Co Coullaine de addins in	or American end
		481 6410101/101 3 40 410101-001/101	1/14 Against
	Inspections On H.W. Tanks W/A		
	Inspection On Ancillary Equipment N/A		
	Contingency Plan:		•
	On Site? <u>YCS</u>		
*	Any changes to facility/ processes or Emerger	ncy Coordinators since last review	? YES - NOT COMPLETED
	Contingency Plan used? 45 (if yes,		
	Agreements with Emergency Responders? <u>b</u>	NEW ASSMERENS	
	· · · · · ·	77	•
	Training Records:		
	Certified Training Documents Available? TRA	When sandpasse in the	RCRA Beaulations
	Any New Employees Since Last Review? 1/6:3	s made to form (a)	and the s
			- programs
Transporters	Evidence Of Improper/ Inadequate Training?		
		TSDS	
	special Commodifies ALD 981908551	5W 077 995 488 5A	·
HAR MAT TAN	1, largue NMD 980769947	Waste Technologyes Inc	Judanes OMD 980613521/
•	→ -1	• •	

Employee Interview:	
Names(s)	Trained
	
Annual Report Submitted	?Copy At Facility?
Emergency Preparednes	5S:
	Operated To Prevent Releases? Releases present on contained
	Or Alarm Present? AIR HORNS + P.A. System
	tion To Summon Outside Help? Phones IN FACILY
	rs And/ Or Fire Control Equipment? YES
	YES, Spill Absolutent material
	Foam, Equipment, Or Auto Sprinkler? No Spankleec
	ested And Maintained? N/~
	.W. Have Access To Alarm/ Device? <u>VE 5</u> acility Operations? None for 55 gollow continues at H.W.
for SN. Accumulation	Area(s) / Location(s) 1-55 gallow governor used on-NOT (LOSED, NO USE. WASLE LABE!
	abeled? 🗶 <55 gal. 🔽 Stored <3 days if full?
Containers: Closed? L	
Storage Area(s): 3 De	MAIN AREA escription HAZARdous whole confuners are myel in with
Storage Area(s): 3 De	MAIN AREA escription HAZARdous whole contamers are myes in with to VIEW 2-55 gallow contamens holding was wash
Storage Area(s): 3 De	MAIN AREA PSCRIPTION HAZARdous WHELF CONTAINERS are MIXED IN WITH TO VIEW 2-55 GALLON CONTAINERS HOLDING WAZ-WAST N- NO Accum SUANDATE
Storage Area(s): 3 De NON-UPL UNABLE 6-85 GALLON CONTAINE	Sele space? No Labeled? Releases?
Storage Area(s): 2 De NON-MAN MNABLE 6 - 35 GALLON CONTAINE Containers: Closed? Air	escription Hazardous whole confirmers are myes in with to view 2-55 gallow confirmers holding was washing who was holding was washing who washing was holding washing who washing washing washing washing are myes in which we have washing with the space? No Labeled? Releases?
Storage Area(s): 3 De NON-471 UNABLE 6-85 GALLON CONTAINE Containers: Closed? Air	sle space? No Labeled? Releases? <90 days?Good condition?
Storage Area(s): 2 De NON-UAN UNABLE 6-85 GALLON CONTAINE Containers: Closed? Air Dated? Other H.W. Units: (App.)	sle space? No Labeled? Releases? Good condition?

Facility Name DANA TRANSPORT	EPA I.D.# NCD	
Inspection Date Jan. 28, 1897		
Site Deficiencies:		
1.) 40 CFR		
2.) 40 CFR		
3.) 40 CFR		
5.) 40 CFR		
6.) 40 CFR		
Recommendations/Violations Continued		
RCRA Inspector (date)	Robert Hayes Facility Contact	(date)
Follow Up Inspection:	·	
Comments		
RCRA Inspector (date)	·Facility Contact	(date)

dil Water Separator - Clean up Area Around the unit - Assess Area suprounding

2 Suel O.1 TANK - Need Clean out confainment area - and assess surrounding ground.

WASIE DEFERMINATION ON CONTAINER holding "Degregger" - Mr. Hayes specified that they do NOT use this material anymore -. Need to dispose of.

TOTE AMA -

5 gallon bucket of BNK-As specified by M. Hayes - A H.W. by Mr. Hayes's
Relages, OBEN constained, No Label(H.W)

Determination

Wasto Determination - ON OPEN 55 gallon Configurer - emitting a solvent oder Model as family by Me. Hayes

MAZ. Whole MANIfest #	Need LDR	NEED Signed o
94004 - 9/8/94 (F) Sound COPY	ZP	
08296 - 08/09/96		
08396 - 11/5/96		
62102 - 6/24/96 (F) VOID		

Reckless

Division of Waste Management Hazardous Waste Section

March 4, 1997

Memorandum To: Mr. Keith Masters

Hazardous Waste Section Western Area Supervisor

From: Joseph S. Parker

Waste Management Specialist Mooresville Regional Office

Subject: Dana Transport, Inc.

NCD 074 505 850 7254 Mt. Holly Road

Charlotte, Mecklenburg Co., N.C. 28214

Potential RCRA Violations

Evidence Log

Compliance Evaluation Inspection conducted January 28, 1996

* All Photographs are located in Appendix A

A. 40 CFR 262.11 - Waste Determination

- 1. During the walk-through portion of the inspection, it was noted that one, fifty-five gallon container located in the Tote Washing Area was noted as having trash intermingled with other unidentified solid waste. The contents of this container must be properly characterized and handled accordingly.
- 2. Photograph # 17 1/28/97.
- 3. When asked about the contents of the container, Mr. Hayes was unable to tell us, specifically, what was in the container.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section

Jesse Wells - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc. Bill Horvath - Dana Transport, Inc.

Bart Massey - Mecklenburg Co. Hazardous Materials Division

B. 40 CFR 262.34(a)(1)(i) - Container Management

- 1. 40 CFR 265.173(a) Open Container
 - a. During the walk through portion of the inspection, it was noted that one,

fifty-five gallon container, used for satellite accumulation was open.

b. Photograph # 10 - 1/28/97

c. Mr. Wells had pointed out the container violation to Mr. Hayes who was unaware that this was a violation

Witnesses: Joseph Parker - N.C. Hazardous Waste Section

Jesse Wells - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc. Bill Horvath - Dana Transport, Inc.

Bart Massey - Mecklenburg Co. Hazardous Materials Division

- 2. 40 CFR 265.174 and 15A NCAC 13A .0110(i) Weekly Inspections
 - a. During the paperwork audit, it was revealed that the facility failed to perform and document the required weekly inspections on containers of hazardous waste in storage.
 - b. Mr. Hayes provided documentation of daily inspections of material in tanks and containers located onsite. These inspection documents were not specific to hazardous waste containers.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc.

C. 40 CFR 262.34(a)(2) - Accumulation Start Date

- 1. During the walk through portion of the inspection, it was noted that twelve, fifty-five gallon containers, holding hazardous waste, were not marked with an accumulation start date.
- 2. Six, fifty-five gallon containers were located in the Tank Cleaning Area. Photograph # 9 shows three, fifty-five gallon containers in this area without accumulation start dates.
- 3. Six, fifty-five gallon containers were located in the Tote Washing Area.

 Photograph # 13 and #14 show a combined four containers without accumulation start dates.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section

Jesse Wells - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc. Bill Horvath - Dana Transport, Inc.

Bart Massey - Mecklenburg Co. Hazardous Materials Division

D. 40 CFR 262.34(a)(3) - Hazardous Waste Labeling

1. During the walk through portion of the inspection, it was noted that one, fifty-five gallon container, used to accumulate hazardous waste, was not clearly marked or

labeled with the words "Hazardous Waste".

2. Photograph # 10 illustrates the container in question.

3. In the photograph there are two, fifty-five gallon containers. During the inspection, Mr. Hayes specified that the container on the left was used for the accumulation of a hazardous waste and the one on the right was used for accumulation of a non-hazardous waste.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section

Jesse Wells - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc. Bill Horvath - Dana Transport, Inc.

Bart Massey - Mecklenburg Co. Hazardous Materials Division

E. 40 CFR 265.16 - Personnel Training

1. 40 CFR 265.16(a)(1) - Training Program

a. During the paperwork audit portion of the inspection, it was noted that the facility could not provide any documentation on a training program designed specifically for the management of hazardous waste.

b. Mr. Robert Hayes could only provide the State with documentation of a training program that entailed general facility operations, such as general safety concerns and the cleaning out of tankers.

Witnesses:

Joseph Parker - N.C. Hazardous Waste Section Robert Hayes - Dana Transport, Inc.

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- 2. 40 CFR 265.16(c) Annual Update of Hazardous Waste Training
 - a. During the paperwork audit portion of the inspection, the facility contact could not provide documentation of an annual review of the initial hazardous waste training.
 - b. Mr. Hayes said that the facility personnel are trained in the operations of the job and safety as they are hired on with the company.

Witnesses:

Joseph Parker - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc.

3. 40 CFR 265.16(d) - Required Records and Documents

During the inspection, the facility contact, Mr. Robert Hayes, could not provide the State with the following documents and records which are required to be at the facility.

a. The job title for each position at the facility related to hazardous waste

management, and the name of the employee filling each job, as required by 40 CFR 265.16(d)(1).

- b. A written job description for each position listed under (a) of this section, as required by 40 CFR 265.16(d)(2).
- c. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under (a) of this section, as required by 40 CFR 265.16(d)(3).
- d. Records that document that the training or job experience required under (a), (b), and (c) of this section has been given to, and completed by, facility personnel, as required by 40 CFR 265.16(d)(4).

Witnesses: Joseph Parker - N.C. Hazardous Waste Section Robert Hayes - Dana Transport, Inc.

F. 40 CFR 262.34(a)(4) - Preparedness and Prevention (Subpart C)

- 1. 40 CFR 265.31 Maintenance and Operation of the Facility
 - a. During the inspection, it was noted that certain areas of the facility were not kept in a manner as to minimize the possibility of a release of a hazardous waste at the facility.
 - b. Photographs detailing open containers, lack of aisle space, and unknown contents in containers are found in picture # 10, # 9, and # 17, respectively.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section

Jesse Wells - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc. Bill Horvath - Dana Transport, Inc.

Bart Massey - Mecklenburg Co. Hazardous Materials Division

- 2. 40 CFR 265.35 Aisle Space
 - a. During the walk through portion of the inspection, it was noted that the facility failed provide a sufficient amount of aisle space to allow for the unobstructed movement of personnel and emergency equipment.
 - b. Photographs # 9, # 13, and #14 illustrate the lack of aisle space between hazardous waste containers in storage.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section

Jesse Wells - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc. Bill Horvath - Dana Transport, Inc.

Bart Massey - Mecklenburg Co. Hazardous Materials Division

G. 40 CFR 262.34(a)(4) - Preparedness and Prevention (Subpart D)

1. 40 CFR 265.53(b) - Copies of the Contingency Plan

- a. During the paperwork audit portion of the inspection, it was noted that the facility had failed to send a copy of their contingency plan and all revisions to the plan to local emergency agencies. The contingency plan and its applicable revisions were also not maintained at the facility.
- b. During a recent incident involving a non-hazardous wastewater spill, responding agencies were not able to contact any facility personnel due to the fact that all facility numbers were disconnected.
- c. On January 28, 1997, I spoke with Mr. Gary McCormick, of the Charlotte-Mecklenburg Fire Department, concerning the incident mentioned in section (b) of this part. Mr. McCormick is a member of the Fire Department team which responded and couldn't reach any of the facility contacts. He said that all telephone numbers listed in the facility's contingency plan had been disconnected.
- d. The facility contact, Mr. Robert Hayes, admitted that he has not revised the current facility's contingency plan since he had been hired in May of 1996. He told me that he had been meaning to do this for some time.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section Robert Hayes - Dana Transport, Inc.

2. 40 CFR 265.54 - Amendment to Contingency Plan

- a. During the paperwork audit portion of the inspection, it was noted that the facility failed to amend their existing contingency plan to reflect a change in emergency coordinators.
- b. Mr. Robert Hayes showed me a copy of the facility's contingency plan which still reflected the previous emergency coordinators, which no longer are employed at the facility.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section Robert Hayes - Dana Transport, Inc.

H. 40 CFR 268.7(a)(7) - Land Disposal Restriction Notices

- 1. During the paperwork audit portion of the inspection, it was noted that the facility failed to retain on-site, copies of Land Disposal Restriction notices for certain hazardous waste manifests. These manifests are as follows: # 08296 8/9/96 and # 08396 11/5/96.
- 2. Mr. Robert Hayes could not produce these documents during the inspection.
- 3. The State has received copies of the hazardous waste manifests that are listed above: #'s 08296 and 08396.

Witnesses: Joseph Parker - N.C. Hazardous Waste Section

Robert Hayes - Dana Transport, Inc.

Dana Transport
Bob Hages Fax # 104-399-3303 800-796-3262

DRAFT

May, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SHORT FORM COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY DOCKET #97-203

JANUARY 28, 1997

-550

Mr. Robert Hayes Dana Transport, Inc. 7254 Mt. Holly Road Charlotte, North Carolina 28214

Re:

Dana Transport, Inc. NCD 074 505 850

Dear Mr. Hayes:

On December 18, 1980, the State of North Carolina Division of Waste Management ("Division"), was authorized to operate the State RCRA hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (the "Act"), and the rules codified at 15A NCAC 13A (the "Rules"). William L. Meyer, Division Director, has been delegated the authority to implement the Act and Rules. Based on an on-site inspection on January 27, 1997, it has been determined that Dana Transport, Inc. is in violation of certain requirements of the Act and Rules as set forth below.

- Dana Transport, Inc. ("Dana") is a company who conducts business in North Carolina and generates hazardous waste as defined in N.C.G.S. 130A-290(8) and 15A NCAC 13A .0102, in <u>Charlotte</u>, <u>Mecklenburg</u> County, North Carolina. Dana is a person as defined in N.C.G.S. 130A-290(22) and 15A NCAC 13A .0102.
- 2. 40 CFR Part 262, codified at 15A NCAC 13A .0107, contains standards and requirements applicable to generators of hazardous waste.
- 3. Dana is listed with the Division as a large quantity generator. A large quantity generator is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and 40 CFR 268.7(a)(4).
- 4. Dana is located on approximately two acres of land in Charlotte, in Mecklenburg Co., North Carolina. Dana is a tank cleaning operation that generates D001 and D008 hazardous wastes at its facility.
- 5. On January 28, 1997, Mr. Joseph Parker and Mr. Jesse Wells, Waste Management Specialists with the Division, conducted an inspection at Dana. During the inspection, Mr. Joseph Parker conducted a paperwork audit, which included looking at all manifests generated since 1994. The audit revealed that D001 and D008 (waste flammable and combustible liquid) wastes were generated at the facility. Both the D001 and D008 hazardous wastes are generated

during the tank cleaning process. The facility cleans large tanks, which connect to tractor-trailers for over the road shipment. The cleaning process is performed after the tanks are unloaded. During the tank cleaning process, the heel of the tank is cleaned out first. The heel consists of the material residue from the product shipped in the tank. It is at this point that a solid waste is generated. Depending on the type of material cleaned out of the tanker, the facility generates a hazardous waste or a nonhazardous waste. This material is then containerized in fifty-five gallon containers and held for shipment to a treatment/storage/disposal facility.

During the inspection, Mr. Joseph Parker noted that the facility was in violation of several requirements of 40 CFB 262, and other violations contained in 15A NCAC 13A. Specifically:

- A. 40 CFR 262.11, codified at 15A NCAC 13A .0107, states that a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:
 - 1. a. He should first determine if the waste is excluded from regulation under 40 CFR 261.4 and 261.5.
 - b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.
 - c. For purpose of compliance with 40 CFR part 268, or if the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, the generator must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - (A). Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261 or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 - (B) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.

Dana is in violation of 40 CFR 262.11, codified at 15A NCAC 13A .0107, in that the facility generated solid waste, as defined in 40 CFR 261.2 and failed to determine if the waste was a hazardous waste. Specifically, Dana failed to conduct a waste determination on one(1) 55-gallon container located in the Tote Washing Area. This container was noted as having trash intermingled with other unidentified solid waste. The content of this container was not properly characterized and handled accordingly. A strong solvent odor was noted at the time of the inspection.

- B. 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and the generator complies with Subpart I, AA, BB and CC of 40 CFR Part 265.
 - 1. 40 CFR 265.173(a), codified at 15A NCAC 13A .0110 states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

- 40 CFR 265.174, codified at 15A NCAC 13A .0110 and 15A NCAC 13A. 0110 states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.
- 3. 15A NCAC 13A .0110(i) states that the owner/operator shall keep records and results of required inspections for at least three (3) years from the date of the inspection.

Dana is in violation of 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, in that it accumulates hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and it did not comply with Subpart I, AA, BB and CC of 40 CFR Part 265. Specifically:

- 1. One (1) container of hazardous waste was not closed during storage, as required by 40 CFR 265.173(a).
- Dana did not inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors as required by 40 CFR 265.174 (Subpart I), codified at 15A NCAC 13A .0110.
- 3. There were no inspection records maintained at the facility. Temedals Mfz. Notes
- C. 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Dana is in violation of 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107, in that it failed to mark their containers holding hazardous waste with accumulation start dates. During the inspection, it was noted that twelve (12) 55-gallon containers, holding hazardous waste, were not marked with an accumulation start date while in storage.

D. 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107, states that while being accumulated on-site each container holding hazardous waste must be labeled or clearly marked with the words "Hazardous Waste."

Dana is in violation of 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107, in that one 55-gallon container being used to accumulate hazardous waste in the Tank Cleaning Area was not clearly mark with the words "Hazardous Waste."

- E. 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4).
 - 1. 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110, states that facility personnel must successfully complete a program of classroom instruction or onthe-job training that teaches them to perform their duties in a way that ensures the facility's compliance with this program includes all the elements described in the document required under paragraph (d)(3) of this section.

- 2. 40 CFR 265.16(c), codified at 15A NCAC 13A .0110, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.
- 3. 40 CFR 265.16(d), codified at 15A NCAC 13A .0110, states that the owner or operator must maintain the following documents and records at the facility:
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
 - (2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section;
 - (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.
- 4. 40 CFR 265.53(b)(Subpart D), codified at 15A NCAC 13A .0110, states that a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.
- 5. 40 CFR 265.54(Subpart D), codified at 15A NCAC 13A .0110, states the contingency plan must be reviewed, and immediately amended when the list of emergency coordinators changes.

Dana is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, in that it accumulated hazardous waste on-site for 90 days or less without a permit or without having interim status, and did not comply with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4). Specifically:

- 1. Dana failed to develop a training program for their employees on hazardous waste management in accordance with 40 CFR 265.16(a)(1).
- 2. Dana failed to provide an annual review of the initial training required in paragraph (a) of this section, as required by 40 CFR 265.16(c).
- 3. Dana did not maintain the following documents and records at the facility as required by 40 CFR 265.16(d):
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

- (2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.
- (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section.
- (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.
- 4. Dana failed to submit copies of the facility's revised contingency plan to the local police departments, fire departments, hospitals, and State and local emergency response teams.
- 5. Dana failed to immediately amend its contingency plan to reflect a change in emergency coordinators.
- F. 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0112, states that generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2-261.6, or exempted from Subtitle C regulation, subsequent to the point of generation.

Dana is in violation of 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0012, in that it did not retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

Specifically, Dana did not maintain Land Disposal Restriction notices for manifest document numbers 08296 dated 8/9/96 and 08396 dated 11/5/96.

ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$27,500.00 per day for each violation of the hazardous waste provisions of the Act, rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty that includes the degree and extent of the harm caused by the violation and the cost of rectifying the damage. 15A NCAC 13A .0702 sets

forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.

After careful consideration of each factor above, penalties are assessed as follows:

A. \$5,500.00; B. \$5,500.00; C. \$5,500.00; D. \$5,500.00; and E. \$1,760.00. Accordingly, a total penalty is imposed in the amount of \$23,760.00.

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Dana is hereby ordered to take the following actions:

- 1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, payable to the Division, and mailed to James A. Carter, Section Chief, Hazardous Waste Section, Division of Waste Management, P.O. Box 29603, Raleigh, North Carolina 27611-7687.
- Dana shall by _____, or as otherwise indicated take the following actions to correct all
 violations as stated in this Short Form Compliance Order with Administrative Penalty and
 otherwise be in compliance with 40 CFR 262, codified at 15A NCAC 13A .0107:
 - A. Comply with 40 CFR 262.11, codified at 15A NCAC 13A .0107. Dana shall determine if the material in a one 55-gallon containers, noted during the inspection, is a hazardous waste.
 - B. Comply with 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107. Dana shall comply with the requirements of Subpart I in 40 CFR 265. Specifically:
 - 1. Dana shall ensure that containers holding hazardous waste are closed during storage, except when it is necessary to add or remove waste as required by 40 CFR 265.173(a), codified at 15A NCAC 13A .0110.
 - 2. Dana shall ensure that weekly inspections on containers of hazardous waste are conducted and documented as required by 40 CFR 265.174 and 15A NCAC 13A .0110(i), codified at 15A NCAC 13A .0110.
 - 3. Dana shall maintain inspection records in accordance with 15A NCAC 13A .0110(i).
 - C. Comply with 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107. Dana shall clearly mark and make visible for inspection, on each container, the date upon which each period of accumulation began.
 - D. Comply with 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107. Dana shall clearly label or mark each hazardous waste container with the words, "Hazardous Waste."
 - E. Comply with 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107. Dana shall comply with the requirements of 40 CFR 265.16, codified at 15A NCAC 13A .0110. Specifically:



- 1. Develop a training program for their employees on hazardous waste management as required by 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110.
- 2. Ensure that facility personnel is provided with an annual review of their initial hazardous waste training as required by 40 CFR 265.16(c), codified at 15A NCAC 13A .0110.
- 3. Maintain the following documents and records at the facility, as required by 40 CFR 265.16(d), codified at 15A NCAC 13A .0110:
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job, as required by 40 CFR 265.16(d)(1):
 - (2) A written job description for each position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(2);
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(3):
 - (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel, as required by 40 CFR 265.16(d)(4).
- 4. Dana shall ensure that a copy of its contingency plan and all revisions to the plan are submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services, as required by 40 CFR 265.53(b) (Subpart D), codified at 15A NCAC 13A .0110.
- 5. Dana shall ensure that the contingency plan is immediately amended to reflect changes in the emergency coordinators as required by 40 CFR 265.54, codified at 15A NCAC 13A .0110.
- F. Comply with 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0112. Dana shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

If the requirements above are not met, additional enforcement action including injunctive relief may be obtained for continued violations of the hazardous waste law or regulations.

Dana has the right to appeal this Compliance Order with Administrative Penalty as described in the attached NOTICE OF RIGHTS document.

If you have any questions concerning this matter, you should contact Dan Bius at (919) 733-2178 extension 220.

Respectfully,

William L. Meyer Waste Management Division

cc:

Central File Joseph Parker Doug Holyfield Keith Masters Pat Williamson

Mecklenburg County Health Director

Diane Long
Attorney General Staff
Shannon Maher, EPA, Region IV

SPANISHOUT ANEX

NOTICE OF RIGHT TO APPEAL

JANAPort; Inte's

Dana has the right to an appeal to contest any matter of law, material fact, requirement, or penalty set forth in this Compliance Order with Administrative Penalty. To appeal this Compliance Order, Dana must file a written petition for a contested case hearing with the Office of Administrative Hearings, P.O. Drawer 27447, Raleigh, North Carolina 27611-7447, within 30 days of receipt of the Compliance Order with Administrative Penalty. For purposes of computing the time limit for filing a petition for a contested case hearing, the Compliance Order will be deemed received on the date it is received by Dana's registered agent. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to Richard B. Whisnant, Process Agent for the Department of Environment, Health and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27604.

The petition for a contested case hearing must be in accordance with N.C. Gen. Stat. 150B-23(a), and must state facts tending to establish that the Division has deprived the petitioner of property, has ordered the petitioner to pay a fine or civil penalty, or has otherwise substantially prejudiced the petitioner's rights and that the Division:

- 1. Exceeded its authority or jurisdiction;
- Acted erroneously;
- 3. Failed to use proper procedure;
- 4. Acted arbitrarily or capriciously; or
- Failed to act as required by law or rule.

The petition must be signed by you or your representative and must be filed with a certificate of service stating that a copy of the petition was served on the Division through its process agent. The hearing will be conducted in accordance with Chapter 150B of the North Carolina General Statutes and the Rules of the Office of Administrative Hearings, a copy of which may be obtained from the Office of Administrative Hearings.

If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment, Health, and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty.

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE ABC, OF THE NEED TO FILE A WRITTEN PETITION FOR A CONTESTED CASE HEARING WITH THE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 30 DAYS OF RECEIPT OF THIS COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY IF A HEARING IS DESIRED.

BY:	
	William L. Meyer, Director Division of Solid Waste Management
DATE	_

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order with Administrative Penalty to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, return receipt requested, postage prepaid) in an envelope addressed to:

Mr. Robert Hayes
Dana Transport, Inc.
7254 Mt. Holly Road
Charlotte, North Carolina 28214

Dated this ____ day of _____, 1996.

William L. Meyer, Director Division of Solid Waste Management

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Regulation Violated: 40 CFR 262.11 Part I. Degree or Extent of Harm (actual or potential) Quantity of waste involved One (1) fifty-five gallon drum Unknown. 1. 2. 3. Is human life or health potentially threatened? yes X no _ Distance to residences unknown Number of people involved ___15 employees Media for exposure: air X groundwater X surface water X direct contact X Are other organisms potentially threatened? yes X no _ 4. Media for exposure: air X ground water X surface water X direct contact X Are any environmental media potentially threatened? yes X no_ 5. air X groundwater X surface water X soil X Is the regulatory program adversely affected? yes X no ___ 6. Harm Cell: Major X Moderate __ Minor __ Remarks: Dana accumulates hazardous waste in a container and failed to properly identify the hazardous waste classification. Part II. Deviation from Regulations 1. Degree of noncompliance with overall regulations: substantial X significant in compliance except for cited violation Deviation cell: Major X Moderate Minor_ Remarks: 40 CFR 262.11 states that a hazardous waste generator must determine if its solid waste is a hazardous waste. MATRIX CELL RANGE: \$1,100.00 to \$ 5,500.00 Penalty amount chosen: \$ 5,500.00 Per Day Assessment:

Remarks: \$5,500.00 was chosen as the penalty amount due to the potential adverse effects Dana is imposing on the health of its employees and environment by not performing an adequate hazardous waste determination on its solid waste.

major Substan.

Name/ID: Dana Transport, Inc.

Part III. Penalty Adjustment (optional)

	·	ercentage change	Dollar Allibuit
1.	Good faith efforts to comply/ lack of good faith:	· 	
2.	Degree of willfulness/neglect:		
2. 3.	History of noncompliance/		
	compliance:		
4.	Other unique factors:		
5.	Adjusted initial penalty (amount from P	art II	\$ <u>5.500.00</u>
6.	Adjusted per-day penalty (amount from	Part II)	
7.	Number of days of violation		
8.	Multi-day penalty (line 6 x line 7)		
9.	Economic benefit of noncompliance (at worksheet)	tach separate	
10.	Total (lines 5 + 8 + 9)		
11.	Ability to pay adjustment		
12.	Total Penalty Amount:		\$ <u>5.550.00</u>
	(may not exceed \$27,500 per day of vi	iolation)	
Remai	rks:		
Compi	liance History :		
Siane	d:	Date:	

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: Dana Transport, Inc.

Regulation Violated: 40 CFR 262.34(a)(1)(i)

Part I. Degree or Extent of Harm (actual or potential)

Quantity of waste involved One (1) fifty-five gallon container used for storage accumulation and twelve (12) fifty-five gallon containers.

Toxicity of waste involved D001 and D008. 2.

3. Is human life or health potentially threatened? yes X no Distance to residences unknown Number of people involved 15 employees

Media for exposure: air X groundwater X surface water X direct contact X

Are other organisms potentially threatened? yes X no _

Media for exposure: air X ground water X surface water X direct contact X

Are any environmental media potentially threatened? yes X no _ 4.

5. air X groundwater X surface water X soil X

6. Is the regulatory program adversely affected? yes X no ____

Harm Cell: Major X Moderate Minor __ Remarks: One open container of ignitable hazardous waste was found in the container storage area. In addition, no weekly inspections were being conducted in the hazardous waste storage area.

Part II. Deviation from Regulations

1. Degree of noncompliance with overall regulations: substantial __ significant X in compliance except for cited violation

Deviation cell: Major __ Moderate X _ Minor__

Remarks: 40 CFR 262.34(a)(1)(i) referenced by 265.173(a) and 174 states that a container of hazardous waste must be closed during storage and requires owners/operators to inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or factors.

MATRIX CELL RANGE:

\$1,100.00 to \$ 5,500.00

Penalty amount chosen:

Per Day Assessment:

Remarks: \$5,500.00 was chosen as the penalty amount due to the potential adverse effects Dana is imposing on the health of its employees and environment by not keeping ignitable waste containers closed and not performing weekly inspections and maintaining records.

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Part III. Penalty Adjustment (optional)

		Percentage change	Dollar Amount
1.	Good faith efforts to comply/ lack of good faith:		
2.	Degree of willfulness/neglect:		
2. 3.	History of noncompliance/ compliance:		
4.	Other unique factors:		
5.	Adjusted initial penalty (amount from		\$ <u>5.500.00</u>
6.	Adjusted per-day penalty (amount from	m Part II)	
7.	Number of days of violation		
8.	Multi-day penalty (line 6 x line 7)		
9.	Economic benefit of noncompliance (a worksheet)	attach separate	
10.	Total (lines 5 + 8 + 9)		
11.	Ability to pay adjustment		
12.	Total Penalty Amount: (may not exceed \$27,500 per day of		\$ <u>5.500.00</u>
Rema			
Comp	liance History:		
Siana	d•	Date:	

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Regu	lation Violated: 40 CFR 262.34(a)2 and a(3)
Part	I. Degree or Extent of Harm (actual or potential)
1.	Quantity of waste involved Tweleve (12)fifty-five gallon containers
2.	Toxicity of waste involved D001 and D008.
3.	Is human life or health potentially threatened? yes X no
	Distance to residences unknown
	Number of people involved 15 employees
	Media for exposure: air X groundwater X surface water X direct contact X
4.	Are other organisms potentially threatened? yes X no _
	Media for exposure: air X ground water X surface water X direct contact X
5.	Are any environmental media potentially threatened? yes X no_
	air X groundwater X surface water X soil X
6.	Is the regulatory program adversely affected? yes X no
Harm	n Cell: Major_X_ Moderate Minor
	arks: Dana stored twelve containers of D001 and D008 waste without having an accumulation date and labeled
	the words "Hazardous Waste." Dana has Significantly increased the potential for harm to human health and the
envir	onment by not labeling and dating each container of hazardous waste, so that anyone who comes in contact with
the c	container knows that it contains hazardous waste.
	Part II. Deviation from Regulations
1.	Degree of noncompliance with overall regulations:
	substantial X_significant in compliance except for cited violation
Devia	ation cell: Major_X_ Moderate Minor
	arks: 262.34(a)(2) and (3) requires a generator to clearly label each container of hazardous waste with the words
<u>"Haz</u>	ardous Waste" and the accumulation start date.
MAT	RIX CELL BANGE 1 100 00 to \$ 5 500 00

Remarks <u>\$5,500.00</u> was chosen as the penalty amount due to the potential adverse effects Dana is imposing on its employees and the environment by not adequately labeling containers of hazardous waste. Emergency response personnel may not be aware of the hazards involved on-site.

\$ 5,500.00

major (major

Penalty amount chosen:

Per Day Assessment:

Name/ID: Dana Transport, Inc.

Part III. Penalty Adjustment (optional)

	'	Percentage change	Dollar Amount
1.	Good faith efforts to comply/ lack of good faith:	· 	
2.	Degree of willfulness/neglect:		<u>-</u>
2. 3.	History of noncompliance/		
	compliance:		
4.	Other unique factors:		
5.	Adjusted initial penalty (amount from Pa	irt II	\$ <u>5.500.00</u>
6.	Adjusted per-day penalty (amount from		
7.	Number of days of violation		
8.	Multi-day penalty (line 6 x line 7)		
9.	Economic benefit of noncompliance (att worksheet)	ach separate	
10.	Total (lines 5 + 8 + 9)		·
11.	Ability to pay adjustment		
12.	Total Penalty Amount:	4	<u>5.550.00</u>
	(may not exceed \$27,500 per day of vice	olation)	
Rema	· · · · · · · · · · · · · · · · · · ·		
Com	pliance History:		
Siane	ed:	Date:	

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: Dana Tansport Inc. NCD 074 505 850 Regulation Violated: 40 CFR 262.34(a)(4) codified at 15A NCAC 13A .0107

Part I. Degree or Extent of Harm (actual or potential)

Quantity of waste involved Twelve (12)fifty-five gallon containers
Toxicity of waste involved D001 and D008.

2.

Is human life or health potentially threatened? yes X no _ 3. Distance to residences unknown Number of people involved 15 employees

Media for exposure: air X groundwater X surface water X direct contact X Are other organisms potentially threatened? yes X no _

Media for exposure: air X ground water X surface water X direct contact X

5. Are any environmental media potentially threatened? yes X no_ air X groundwater X surface water X soil X

Is the regulatory program adversely affected? yes X no ___

Harm Cell: Major_X Moderate_ Minor_

Remarks: Dana failed to develop a training program for their employees on hazardous waste management. Employees did not take part initially nor in an annual review of hazardous waste training as required. The facility could not produce records of job titles related to the handling of hazardous waste and written job descriptions for each position. Dana could not produce a written description of the type and the amount of both introductory and continuing training that would be given to each person filling a hazardous waste position and finally could not produce records to document that training or job experience required had been given to and completed by facility personnel. The inspector also noted that a revised list of emergency coordinators was not sent to the local police, fire department etc. In addition, the facility failed to its contingency plan to reflect a change in emergency coordinators.

Part II. Deviation from Regulations

1. Degree of noncompliance with overall regulations: substantial _ significant X in compliance except for cited violation

Deviation cell; Major X Moderate_ Minor_

Remarks: 40 CFR 262.34(a) requires a generator to comply with Subparts C & D and 265.16. 265.16(a)(1) requires a generator to provide a training program in hazardous waste management, 265,16(c) requires a generator to annually train its employees to ensure they perform their duties and 265.16(d) requires a generator to comply with all training requirements and Subpart D contains the contingency plan requirements.

MATRIX CELL RANGE Penalty amount chosen: Per Day Assessment:

1,100.00 to \$5,500.00 \$ 5,500.00

Remarks \$ 5,500.00 was chosen as the penalty amount due to the potential adverse health and environmental effects Dana is imposing on the health of its employees, and the environment by not properly training employees, documenting job descriptions for employees managing hazardous waste, and failing to update the contingency plan and distribute it local response agencies.

Why significant?

Part III. Penalty Adjustment (optional)

1.	Good faith efforts to comply/		
	lack of good faith:		
2.	Degree of willfulness/neglect:		
2. 3.	History of noncompliance/		
•	compliance:		
4.	Other unique factors:		· ·
5.	Adjusted initial penalty (amount from Part	+ 1f\	\$ <u>5.500.00</u>
			¥ <u>5050000</u>
<u>6</u> .	Adjusted per-day penalty (amount from Pa	art iii	
7.	Number of days of violation		
8.	Multi-day penalty (line 6 x line 7)	_	
9.	Economic benefit of noncompliance (attack	ch separate	
	worksheet)		
10.	Total (lines 5 + 8 + 9)		
11.	Ability to pay adjustment		
12.	Total Penalty Amount:		\$ 5.500.00
	(may not exceed \$27,500 per day of violations)	ation)	
Rema			
	ppliance History:		
-5511	ibitation titotati t		
Siana	ad:	Date:	

Percentage change Dollar Amount

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

	ne/ID: <u>Dana Transport, Inc.</u> ulation Violated: <u>40 CFR 268.7(a)(7)</u>
Part	I. Degree or Extent of Harm (actual or potential)
1.	Quantity of waste involved <u>Tweleve (12)fifty-five gallon containers</u>
2.	Toxicity of waste involved D001 and D008.
3.	Is human life or health potentially threatened? yes X no _
٠.	Distance to residences unknown
	Number of people involved 15 employees
	Media for exposure: air X groundwater X surface water X direct contact X
4.	Are other organisms potentially threatened? yes X no _
	Media for exposure: air X ground water X surface water X direct contact X
5.	Are any environmental media potentially threatened? yes X no_
	air X groundwater X surface water X soil X
6.	Is the regulatory program adversely affected? yes X no
	m Cell: Major Moderate_X_Minor
	narks: Dana did not maintain Land disposal Restriction notices for manifest document numbers 08296 and 08396
	ed August 8, 1996 and November 5, 1996, respectively for at least five years.
	Part II. Deviation from Regulations
1.	Degree of noncompliance with overall regulations:
	substantial significant in compliance except for cited violation _X_
Dev	iation cell: Major_ Moderate_X_ Minor
	narks: 40 CFR 268.7(a)(7) requires generators to retain an on-site a copy of all notices, certifications,
	constrations, waste analysis data, analysis data, and other documentation produced pursuant to the Land Disposa
	triction for five (5) years.
MA	TRIX CELL RANGE 275.00 to \$ 1,760.00
	Penalty amount chosen: \$ <u>1,760.00</u>
	Per Day Assessment:

Remarks \$1,760.00 was chosen as the penalty because Dana is imposing on its employees and the environment.

Part III. Penalty Adjustment (optional)

	•	ercentage change	Dollar Allibuit
1.	Good faith efforts to comply/ lack of good faith:		
2.	Degree of willfulness/neglect:		 _
2. 3.	History of noncompliance/		
	compliance:		
4.	Other unique factors:		
	Adjusted initial penalty (amount from Par	rt II	\$ <u>1.760.00</u>
6.	Adjusted per-day penalty (amount from F		
5. 6. 7. 8.	Number of days of violation		
8.	Multi-day penalty (line 6 x line 7)		
9.	Economic benefit of noncompliance (attaworksheet)	ach separate	
10.	Total (lines $5 + 8 + 9$)		
11.	Ability to pay adjustment		
12.	Total Penalty Amount:	:	<u> 1.760.00</u>
	(may not exceed \$27,500 per day of vio	lation)	
Rema	arks:		
Com	pliance History:		
Siane	ed:	Date:	<u> </u>

NCDEHNR - Hazardous Waste Section

919 N. Main Street Mooresville, N.C. 28115 704-663-1699 Fax: 704-663-6040

FAX TRANSMISSION COVER SHEET

Date:

April 14, 1997

To:

Doug Holyfield

Fax:

910-771-4631

Re:

Dana Transport- RCRIS

Sender:

Joseph S. Parker

YOU SHOULD RECEIVE 5 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 704-663-1699.

State of North Carolina Department of Environment, Health and Natural Resources Division of Waste Management Hazardous Waste Section

SITE SAFETY PLAN (HWS-SSP)

	TVDE	DATE	. 1	ACTIVITY	DATE
-	TYPE		X	ACTIVITY	DATE
_	CME		X_	INSPECTION	2-28-57
	CEI	2-28-97	_	DRUM/SLUDGE SAMPLING	
	CDI			SOIL/SEDIMENT SAMPLING	
	RFI			GROUNDWATER SAMPLING	ļ
	RFA			SURFACE WATER SAMPLING	<u> </u>
	0 & M			AIR SAMPLING	
	SITE INVESTIGATION/ VISIT OTHER:		<u> </u>		
	EMERGENCY INFORMATIO Ambulance: Meck. Co. Hospital: Meck. Co. Police: Meck. Co.	N		Telephone#	911
•	Ambulance: Meck. Co.	<i>(0.</i> reviewed:		Telephone# Telephone# Telephone#_ Telephone#_	911

Information Sources:	/.	_	./			
Information Sources: Part B:Sta *Facility Safety P	te:	Contingency Plan	n:Part A	: RFA	Л: СІ	osure Plan:
*Request copy of	ian: <u> </u>	Umer: Safety/Contingenc	v Plan for refe	ence	:	
request oopy of	r domity c	Jaicty/ Contingent		CHOC.	-	
Permit Information:		_				·
Check each poss Hazardous Waste	essed án	d whether current	status is interi	m, etc.		
Hazardous Waste	: <u>/////</u> /	Status:	_ Water:	A!r:	Other:	
Summary of Regulated U	nits (Indic	cate number of un	its):		:	
Landfills	Incinera	itors: Sto	rano aroas. A	Waste!	Piles:	_
Surface Impound Description: FACILITY	ments:	Tank farms:	SWMU	S:(Other: 🗓	- (1/
description <u>: Facility 1</u>	has the	areas where	- HAZAGON	2 NASK	THY (3 GH	cumw Alm
						
-						
E) PROJECT ORGA The following personnel ar be carrying out on the site	e designated t			sibilities (ie.field	team leader, etc	.) and the tasks they will
HWS Project Participa	nts	Responsibility	and Tasks		Level of Pro	tection
Joseph Panken Joseph Wells		Lead Ing Secondary D	rector		evel D	
JASSE WElls		Secondary A	wasechor	Le	wel D	
		/	7			
			. <u></u>		<u> </u>	
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applicable:		L		!	<u>i</u>	
	o et u	Bassasibilis	u and Tasks	l aval of l	Protection	1100 510
(Sub)Contractor Work P	апу	Responsibilit	y and Tasks	Leveloti	Protection	H&S Plan?
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			· · · · · · · · · · · · · · · · · · ·			
		L				J
					.	
F) HEALTH AND SA	FETY EV	ALUATION			11	
Chemical Hazards:		<u> </u>			!	
Constituent Skin Designation?		hold Limit Value or Threshold	Media Descri	iption	FP/ BP/ los	nization Potential
ONIT DESIGNATION OF IT		71 711 (311010				
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Poss	ib	Ìе	Phy	/sical	Haz	zards
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Hazard	Yes	No	Hazard	Yes	No
Electrical Hazards:			Confined Space		
Uneven/Slippery Ground:			Noise:	_	
Trips/Falls			Drums/Containers		
Structural Hazards:			Other:		
Heavy Equipment:					
Biologic:]		·		
Heat/Cold					Γ

the said and the said and the same appearance in the said and the said	
Hazard summary (also discuss known concentrations):	
Hazard Information Source(s): Ie. NIOSH Pocket Guide to Chemical Hazards	
Previous Releases, Accidents or Complaints	
(describe whether air, soil, water or industrial and if corrected):	

(G) PERSONAL PROTECTIVE EQUIPMENT

Description		Level of Protection			Description		Level of Protection			
CLOTHING	В	С	(p		RESPIRATORY PROTECTION	В	e	D	_	
Coveralis			11		Cloth Respirator				[
Tyvek					Full-face Air-purifying Respirator			\prod		
Coated Tyvek			П	7	Self-contained Breathing Apparatus			П	_	
Saranex			П	7	HANDS/ARMS			П	_	
HEAD, FACE AND EYES			П	7	Vinyl Gloves			\prod		
Hardhat	\prod		\prod]	Latex Gloves			П		
Safety Glasses			П		Nitrile Gloves			\prod	_	
Goggles					PVC Gloves			\prod		
Splash Guard			П	7	Duct Tape			Π		
FOOT PROTECTION	T^{-}		П	٦	OTHER:	1		\prod		
Steel-toed Safety Boots			\prod				Π	П		
Chemical-resistant Boot Covers			\prod	٦				Π		

NOTE: During normal daily work activities, HWS employees are required to always have in their possession a First Aid kit and fire extinguisher as well as any other of the above listed equipment.

DECONTAMINATION PROCEDURES

(H) DECONTAMINATION PROCEDURES

Most equipment used by HWS personnel is disposable; and thus, should be discarded upon concluding the project, inspection,

which are re-usable shall be decontaminated according to EPA and HWS protocols.

NOTE: CONTAMINATED DISPOSABLE EQUIPMENT SHOULD REMAIN AT THE SITE OF ORIGIN.

				Action Level			
Monitoring Instrument	YES	N	9/	Monitoring Interval	D-> C (maa)	. C→B (ppm)	Stop Work (ppm)
ID (PhotoVac Microtip)							
ID (Organic Vapor Analyzer)							
nfrared Spectrophotometer				· ·			
ombustible Gas Indicator							
olormetric Detector Tubes			\prod				
Other:			abla				
						•	
COMMUNICATION /S Personnel, in the process of communication or in sight of the sight and Safety Coordinatelephone on site will be used the sight one #:	conductir heir partn ator. The d for conta	ng o er (a HW: actin	perat HW: S-H& ng em	tions beyond routine in S employee). All accide S Coordinator will indic nergency personnel and	ents, injuries and ate the need to	demergencies : evacuate the si	shall be reported to
/S Personnel, in the process of communication or in sight of the /S Health and Safety Coordina elephone on site will be used	conductir heir partn ator. The d for conta	ng o er (a HW: actin	perat HWS S-H& ng em	tions beyond routine in S employee). All accide S Coordinator will indic nergency personnel and	nts, injuries and ate the need to I other reporting	demergencies : evacuate the si	shall be reported to
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RCRIS

EPA ID #: NCD 074 505 850

FACILITY NAME: Dana Transport, Inc. CITY: Charlotte, N.C.

EVALUATION DATA:

NEW: X CHANGE: DELETE:

PERSON: 029 BRANCH: 01 AGENCY: STATE REASON: 01

SUPERVISOR NOV TRACKING INFO

TYPE: CEI

INITIAL INSPECTION DATE: January 28, 1997

DOCKET: 97-REINSP DATE:

COMMENTS: Compliance order with Administrative Penalty

GENERATORS:

GBF: GER: GGR:X GLB:X GMR:X GOR: GPT:X GRR:X GSC: GSQ:

TRANSPORTERS:

TGR: TMR: TOR: TRR: TWD:

TSD's

DBF: DCH: DCL: DFR: DGS: DGW: DIN: DLB: DLF: DLT: DMC:

DMR: DOR: DOT: DPB: DPP: DSI: DTR: DTT: DWP:

USED OIL:

TUO: TFO: BUO: MUO: PUO: RUO:

VIOLATION DATA: New:X Change: Delete:

1. Agency: State Type: GGR Date Determined: 1-28-97

Class: 1 Priori

Priority: Sea#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.11

Comment: Waste determination needed on two, fifty-five gallon containers noted during

the inspection

2. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq.#

Returned to Compliance:

Actual Date:

Reg. Description: 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.173(a)

Comment: Facility failed to keep a container used for accumulating hazardous waste closed during storage.

3. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174

Comment: Facility failed to retain records of required inspections on containers of hazardous waste in storage.

4. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(2)

Comment: Facility failed to mark 12-55 gallon containers holding hazardous waste with

accumulation start date

5. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(3)

Comment: Facility failed to label one container holding hazardous waste with the words

"Hazardous Waste".

6. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1)

Comment: Facility failed to develop a training program for their employees on

Seq#

hazardous waste management

7. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority:

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) Comment: No annual review of hazardous waste training

8. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:
Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(1)

Comment: No job titles

9. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(2)

Comment: No written job descriptions

10. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(3)

Comment: No written descriptions of the type and amount of training

11. Agency: State Type:GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Reg. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(4)

Comment: No records of training

12. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.31

Comment: Failed to minimize a possibility of a release of hazardous waste

13. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.35 (Subpart C)

Comment: No aisle space

14. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Req. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.53(b)(subpart D)

Comment: Facility failed to submit copies of a revised contingency plan to local

authorities

15. Agency: State Type: GPT Date Determined:1-28-97

Class: 1 Priority: Seq#

Returned to Compliance:

Actual Date:

Reg. Description: 40 CFR 262.34(a)(4) ref. 40 CFR 265.54(subpart D)

Comment: Facility failed to immediately amend their contingency to show change in

emergency coordinators.

16. Agency: State Type:GLB

Date Determined:1-28-97

Seq#

Class: 1

Priority:

Returned to Compliance:

Actual Date:

Req. Description:40 CFR 268.7(a)(7)

Comment: Facility failed to maintain copies of LDR's

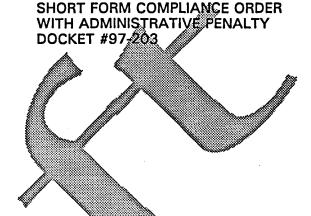
CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Robert Hayes
Dana Transport, Inc.
7254 Mt. Holly Road
Charlotte, North Carolina 28214

Re:

Dana Transport, Inc. NCD 074 505 850

Dear Mr. Hayes:



On December 18, 1980, the State of North Carolina Division of Waste Management ("Division"), was authorized to operate the State RCRA hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (the "Act"), and the rules codified at 15A NCAC 13A (the "Rules"). William L. Meyer, Division Director, has been delegated the authority to implement the Act and Rules. Based on an on-site inspection on January 27, 1997, it has been determined that Dana Transport, Inc. is in violation of certain requirements of the Act, and Rules as set forth below.

- 1. Dana Transport, Inc. ("Dana") is a company who conducts business in North Carolina and generates hazardous waste as defined in N.C.G.S. 130A-290(8) and 15A NCAC 13A .0102, in Charlotte, Meckenburg County, North Carolina. Dana Transport is a person as defined in N.C.G.S. 130A-290(22) and 15A NCAC 13A .0102.
- 2. 40 CFR Part 262, codified at 15A NCAC 13A .0107, contains standards and requirements applicable to generators of hazardous waste.
- 3. Dana is listed with the Division as a large quantity generator. A large quantity generator is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and 40 CFR 268.7(a)(4).
- 4. Dana is located on approximately two acres of land in Charlotte, in Mecklenburg Co., North Carolina. Dana is a tank cleaning operation that generates D001 and D008 hazardous waste at its facility.
- 5. On January 28, 1997, Mr. Joseph Parker and Mr. Jesse Wells Waste Management Specialists with the Division conducted an inspection at Dana. During the inspection, Mr. Joseph Parker conducted a paperwork audit, which included looking at all manifests generated since 1994. The audit revealed that D001 and D008 (waste flammable and combustible liquid) wastes were generated at the facility. Both the D001 and D008 hazardous wastes are generated during the tank cleaning process. The facility cleans large tanks, which connects to tractor-

trailers for over the road shipment. The facility cleans these tanks after they are unloaded at their final destination. During the tank cleaning process, the heel of the tank is cleaned out first. The heel consists of the material residue from the product shipped in the tank. It is at this point that a solid waste is generated. Depending on the type of material cleaned out of the tanker, the facility generates a hazardous waste or a nonhazardous waste. This material is then containerized in fifty-five gallon containers and held for shipment to their designated TSDF.

During the inspection, Mr. Joseph Parker noted that the facility was in violation of several requirements of 40 CFR 262, and other violations contained in 15A NCAC 13A specifically:

- A. 40 CFR 262.11, codified at 15A NCAC 13A 0107, states that a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:
 - 1. a. He should first determine if the waste s excluded from regulation under 40 CFR 261.4 and 261.5.
 - b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.
 - c. For purpose of compliance with 40 CFR part 268, or if the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, the generator must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - (A). Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261 or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 - (B) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.

Dana is in violation of 40 CFR 262.11, codified at 15A NCAC 13A .0107, in that the facility generated solid waste, as defined in 40 CFR 261.2 and failed to determine if the waste was a hazardous waste. Specifically, Dana failed to conduct waste determinations on one(1) fifty-five gallon container located in the Tote Washing Area. This container was noted as having trash intermingled with other unidentified solid waste. The content of this container were not properly characterized and handled accordingly.

- B. 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the waste is placed in containers and the generator complies with Subpart I, AA, BB and CC of 40 CFR Part 265.
 - 1. 40 CFR 265.173(a), codified at 15A NCAC 13A .0110 states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
 - 2. 40 CFR 265.174, codified at 15A NCAC 13A .0110 and 15A NCAC 13A.0110

states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

Dana is in violation of 40 CFR 262.34(a)(1)(i), codified at 15A NCAC 13A .0107, in that it accumulates hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and it did not comply with Subpart I, AA, BB and CC of 40 CFR Part 265. Specifically:

- 1. One (1) container of hazardous waste was not closed during storage, as required by 40 CFR 265.173(a).
- Dana did not inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors as required by 40 CFR 265.174 (Subpart I), codified at 15A NCAC 13A .0110. There was no record of inspections.
- C. 40 CFR 262.34(a)(2), codified at 15A NCAC 13A 0107, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Dana is in violation of 40 CFR 262.34(a)(2), codified at 15A NCAC 13A .0107 in that it failed to mark their containers holding hazardous waste with accumulation start dates. During the inspection, it was noted that twelve, fifty-five gallon containers, holding hazardous waste, were not marked with an accumulation start date while in storage.

D. 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107, states that while being accumulated on-site each container holding hazardous waste must be labeled or clearly marked with the words "Hazardous Waste."

Dana is in violation of 40 CFR 262.34(a)(3), codified at 15A NCAC 13A .0107, in that one 55-gallon container being used to accumulate hazardous waste in the Tank Cleaning Area was not clearly mark with the words "Hazardous Waste."

- E. 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4).
 - 1. 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110, states that facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with this program includes all the elements described in the document required under paragraph (d)(3) of this section.
 - 2. 40 CFR 265.16(c), codified at 15A NCAC 13A .0110, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

- 3. 40 CFR 265.16(d), codified at 15A NCAC 13A .0110, states that the owner or operator must maintain the following documents and records at the facility:
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
 - (2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section;
 - (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.
- 4. 40 CFR 265.53(b)(Subpart D), codified at 15A NCAC 13A .0110, states that a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.
- 5. 40 CFR 265.54(Subpart D), codified at 15A NCAC 13A .0110, states the contingency plan must be reviewed and immediately amended when the list of emergency coordinators changes.

Dana is violation of 40 CFR 262 34(a), codified at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4).

- 1. Dana failed to develop a training program for their employees on hazardous waste management.
- 2. Dana failed to provide an annual review of the initial training required in paragraph (a) of this section, as required by 40 CFR 265.16(c). The facility could not provide documentation of an annual review of the initial hazardous waste training.
- Dana did not maintain the following documents and records at the facility as required by 40 CFR 265.16(d):
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
 - (2) A written job description for each position listed under paragraph (d)(1)

of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.

- (3) A written description of the type and amount of both introductory and continuing training that will be given to each person tilling a position listed under paragraph (d)(1) of this section.
- (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personner.
- 4. Dana failed to submit copies of the facility's revised contingency plan to the local police departments, fire departments, hospitals, and State and local emergency response teams.
- 5. Dana failed to immediately amend its contingency plan to reflect a change in emergency coordinators.
- F. 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0112 states that generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2-261.6, or exempted from Subtitle C regulation, subsequent to the point of generation.

Dana is in violation of 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0012, in that it did not retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

Specifically, Dana did not maintain Land Disposal Restriction notices for manifest document numbers 08296 dated 8/9/96 and 08396 dated 11/5/96.

ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$27,500.00 per day for each violation of the hazardous waste provisions of the Act, rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty that include the degree and extent of the harm caused by the violation and the cost of rectifying the damage. 15A NCAC 13A .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response

measures taken by the violator, damage to private property and the history of non-compliance.

After careful consideration of each factor above, penalties are assessed as follows:	
A. \$5.500.00; B. \$5.500.00; C. \$5.500.00; D. \$5.500.00; and E. \$5.500.00.	Accordingly, a
total penalty is imposed in the amount of $$27.500.00$.	
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CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Dana is hereby ordered to take the following actions:

- 1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, payable to the Division, and mailed to James A. Carter. Section Chief. Hazardous Waste Section, Division of Solid Waste Management, P.U. Box 29603, Rajeigh, North Carolina 27611-7687.
- 2. Dana shall by _____, or as otherwise indicated take the following actions to correct all violations as stated in this Compliance Order and otherwise be in compliance with 40 CFR 262, codified at 15A NCAC 13A .0107:
- A. Comply with 40 CFR 262.11, codified at 15A NCAC 13A 0107. Dana shall determine if the material in two separate lifty-five-gallon containers, noted during the inspection, is a hazardous waste.
 - B. Comply with 40 CFR 262.34(a)(1)(i), codified at 15A/NCAC 13A .0107. Dana shall comply with the requirements of Subpart I in 40 CFR 265. Specifically:
 - 1. Dana shall ensure that containers holding hazardous waste are closed during storage, except when it is necessary to add or remove waste as required by 40 CFR 265.173(a), codified at 15A NCAC 13A .0110.
 - Dana shall ensure that weekly inspections on containers of hazardous waste are conducted and documented as required by 40 CFR 265.174 and 15A NCAC 13A U110(i), codified at 15A NCAC 13A .0110.
 - C. Comply with 40 CFR 262 34(a)(2), codified at 15A NCAC 13A .0107. Dana shall clearly mark and make visible for inspection, on each container, the date upon which each period of accumulation began.
 - D. Comply with 40 CFF 262.34(a)(3), codified at 15A NCAC 13A .0107. Dana shall label or mark each hazardous waste container clearly with the words, "Hazardous Waste."
 - E. Comply with 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0107. Dana shall comply with the requirements of 40 CFR 265.16, codified at 15A NCAC 13A .0110 Specifically:
 - Develop a training program for their employees on hazardous waste management as required by 40 CFR 265.16(a)(1), codified at 15A NCAC 13A .0110.
 - 2. Ensure that facility personnel is provided with an annual review of their initial hazardous waste training as required by 40 CFR 265.16(c), codified at

15A NCAC 13A .0110.

- 3. Maintain the following documents and records at the facility, as required by 40 CFR 265.16(d), codified at 15A NCAC 13A .0110:
 - (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job, as required by 40 CFR 265.16(d)(1);
 - (2) A written job description for each position listed under paragraph (d)(1) of this section, as required by 40 CFR 265, 16(d)(2);
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section, as required by 40 CFR 265.16(d)(3);
 - (4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel, as required by 40 CFR 265.16(d)(4).
- 4. Dana shall ensure that a copy of its contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services, as required by 40 CFR 265.53(b) (Subpart D), codified at 15A NCAC 13A 0110.
- 5. Dana shall ensure that the contingency plan is immediately amended to reflect changes in the emergency coordinators as required by 40 CFR 265.54, codified at 15A NCAC-13A .0110.
- F. Comply with 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0112. Dana shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

If the requirements above are not met, additional enforcement action including injunctive relief may be obtained for continued violations of the hazardous waste law or regulations.

Dana has the right to appeal this Compliance Order with Administrative Penalty as described in the attached NOTICE OF RIGHTS document.

If you have any questions concerning this matter, you should contact Dan Bius at (919) 733-2178 extension 220.

Respectfully,

William L. Meyer Waste Management Division

Central File cc: Joseph Parker Doug Holyfield Keith Masters Pat Williamson

Mecklenburg County Health Director Diane Long Attorney General Staff Shannon Maher, EPA, Region IV



NOTICE OF RIGHT TO APPEAL

Dana has the right to an appeal to contest any matter of law, material fact, requirement, or penalty set forth in this Compliance Order with Administrative Penalty. To appeal this Compliance Order, Dana must file a written petition for a contested case hearing with the Office of Administrative Hearings, P.O. Drawer 27447, Raleigh, North Carolina 27611-7447, within 30 days of receipt of the Compliance Order with Administrative Penalty. For purposes of computing the time limit for filing a petition for a contested case hearing, the Compliance Order will be deemed received on the date it is received by Dana's registered agent. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to Richard B. Whisnant, Process Agent for the Department of Environment Health and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27604.

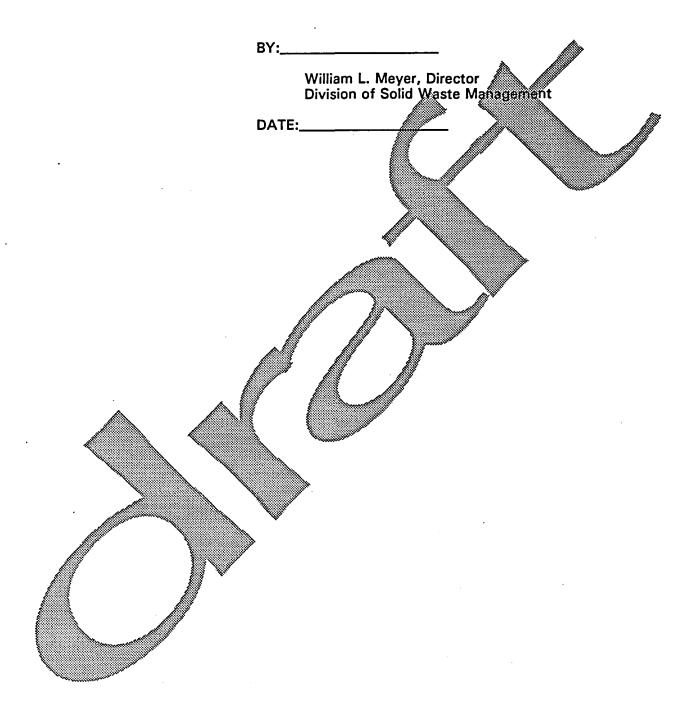
The petition for a contested case hearing must be in accordance with N.C. Gen. Stat. 150B-23(a), and must state facts tending to establish that the Division has deprived the petitioner of property, has ordered the petitioner to pay a fine or civil penalty, or has otherwise substantially prejudiced the petitioner's rights and that the Division:

- 1. Exceeded its authority or jurisdiction;
- 2. Acted erroneously;
- 3. Failed to use proper procedure;
- 4. Acted arbitrarily or capriciously; or
- Failed to act as required by law or rule.

The petition must be signed by you or your representative and must be filed with a certificate of service stating that a copy of the petition was served on the Division through its process agent. The hearing will be conducted in accordance with Chapter 150B of the North Carolina General Statutes and the Rules of the Office of Administrative Hearings, a copy of which may be obtained from the Office of Administrative Hearings.

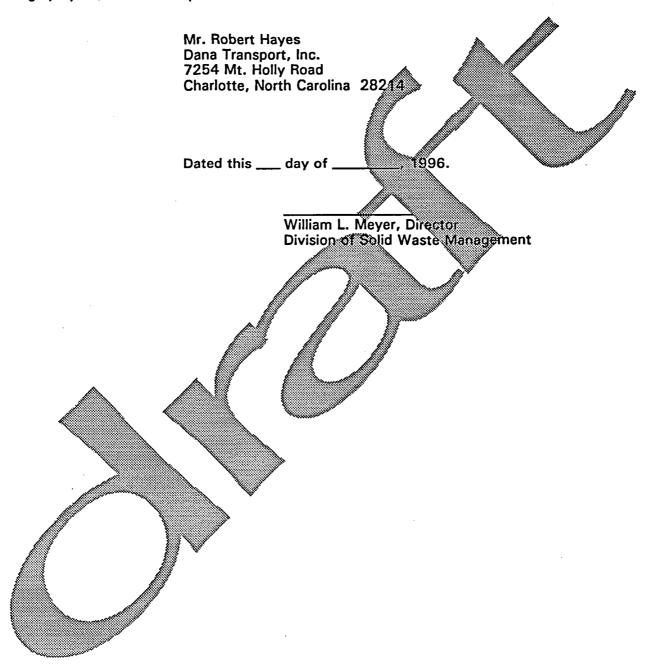
If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment, Health, and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty.

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE ABC, OF THE NEED TO FILE A WRITTEN PETITION FOR A CONTESTED CASE HEARING WITH THE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 30 DAYS OF RECEIPT OF THIS COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY IF A HEARING IS DESIRED.



CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order with Administrative Penalty to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, return receipt requested, postage prepaid) in an envelope addressed to:



PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: Dana Transport, Inc. Regulation Violated: 40 CFR 262.11

Part I. Degree or Extent of Harm (actual or potential)

Quantity of waste involved One (1)fifty-five gallon drum

2. Toxicity of waste involved unknown.

3. Is human life or health potentially threatened? yes X no _ Distance to residences unknown Number of people involved 15 employees

Media for exposure: air X groundwater X surface water X direct contact X

4. Are other organisms potentially threatened? yes X no _

Media for exposure: air X ground water X surface water X direct contact X Are any environmental media potentially threatened? yes X no_

5. air X groundwater X surface water X soil X

6. Is the regulatory program adversely affected? yes X no _

Harm Cell: Major X Moderate Minor Remarks: Dana accumulates hazardous waste in a container and failed to properly identify the hazardous waste classification.

Part II. Deviation from Regulations

1. Degree of noncompliance with overall regulations: substantial __ significant X_ in compliance except for cited violation

Major X Moderate Minor_ Deviation cell:

Remarks: 40 CFR 262,11 states that a hazardous waste generator must determine if its solid waste is a hazardous waste.

MATRIX CELL RANGE:

Penalty amount chosen: Per Day Assessment:

\$1,100.00 to \$ 5,500.00

\$ 5.500.00

Remarks: \$5,500.00 was chosen as the penalty amount due to the potential adverse effects Dana is imposing on the health of its employees and environment.



Percentage change **Dollar Amount** 1. Good faith efforts to comply/ lack of good faith: 2. Degree of willfulness/neglect: 3. History of noncompliance/ compliance: 4. Other unique factors: Adjusted initial penalty (amount from Part II Adjusted per-day penalty (amount from Part II) 5. \$ 5.500.00 6. 7. Number of days of violation 8. Multi-day penalty (line 6 x line 7) 9. Economic benefit of noncompliance (attach separate worksheet) 10. Total (lines 5 + 8 + 9) 11. Ability to pay adjustment 12. **Total Penalty Amount:** (may not exceed \$27,500 per day of violation) Remarks: Compliance History: Date: Signed:__

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: Dana Transport, Inc.

Regulation Violated: 40 CFR 262.34(a)(1)(i)

Part I. Degree or Extent of Harm (actual or potential)

1. Quantity of waste involved One (1)fifty-five gallon container used for satellite accumulation and twelve (12) fifty-five gallon containers.

2. Toxicity of waste involved D001 and D008.

Is human life or health potentially threatened? yes X no ____
 Distance to residences unknown
 Number of people involved ___15 employees____

Media for exposure: air X groundwater X surface water X direct contact X

4. Are other organisms potentially threatened? yes X no _____

Media for exposure: air X ground water X surface water X direct contact X

5. Are any environmental media potentially threatened? yes X no air X groundwater X surface water X soil X

6. Is the regulatory program adversely affected? yes X no

Harm Cell: Major X Moderate Minor _

Remarks: One open container in the container storage area. In addition, no weekly inspections were being conducted in the hazardous waste storage area.

Part II. Deviation from Regulations

 Degree of noncompliance with overall regulations: substantial __ significant X_ in compliance except for cited violation

Deviation cell: Major _ Moderate X Minor_

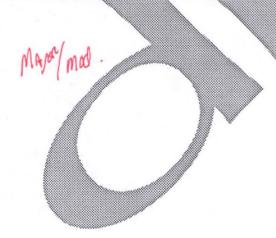
Remarks: 40 CFR 262.34(a)(1)(i) states that a container of hazardous waste must be closed during storage and requires owners/operators to inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or factors.

MATRIX CELL RANGE:

\$1,100.00 to \$ 5,500.00

Penalty amount chosen: Per Day Assessment: \$ 5,500.00

Remarks: \$5,500.00 was chosen as the penalty amount due to the potential adverse effects Dana is imposing on the health of its employees and environment.



Percentage change **Dollar Amount** 1. Good faith efforts to comply/ lack of good faith: 2. 3. Degree of willfulness/neglect: History of noncompliance/ compliance: Other unique factors: 4. Adjusted initial penalty (amount from Part II Adjusted per-day penalty (amount from Part II) \$ 5.500.00 5. 6. Number of days of violation 7. Multi-day penalty (line 6 x line 7) 8. Economic benefit of noncompliance (attach separate 9. worksheet) 10. Total (lines 5 + 8 + 9) Ability to pay adjustment 11. 12. **Total Penalty Amount:** (may not exceed \$27,500 per day of violation) Remarks: Compliance History: Date: Signed:__

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: Dana Transport, Inc.
Regulation Violated: 40 CFR 262.34(a)2 and a(3)

Part I. Degree or Extent of Harm (actual or potential)

- 1. Quantity of waste involved Tweleve (12) fifty-five gallon containers
- 2. Toxicity of waste involved D001 and D008.
- 3. Is human life or health potentially threatened? yes X no Distance to residences unknown Number of people involved 15 employees

Media for exposure: air X groundwater X surface water X direct contact X

4. Are other organisms potentially threatened? yes X no

Media for exposure: air X ground water X surface water X direct contact X

5. Are any environmental media potentially threatened? yes X no_ air X groundwater X surface water X soil X

Is the regulatory program adversely affected? yes X no

6. Moderate__ Minor_ Harm Cell: Major_X_

Remarks: Dana stored twelve containers of D001 and D008 waste without having an accumulation date and labeled with the words "Hazardous Waste." Dana has Significantly increased the potential for harm to human health and the environment by not labeling and dating each container of hazardous waste, so that anyone who comes in contact with the container knows that it contains hazardous waste.

Part II. Deviation from Regulations

1. Degree of noncompliance with overall regulations: substantial X significant in compliance except for cited violation

Deviation cell: Major X Moderate Minor ____

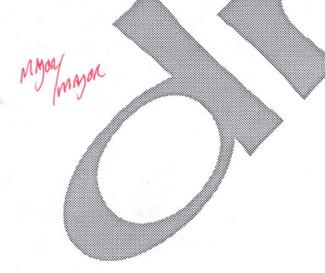
Remarks: 262.34(a)(2) and (3) requires a generator to clearly label each container of hazardous waste with the words "Hazardous Waste" and the accumulation start date.

MATRIX CELL RANGE

Penalty amount chosen: Per Day Assessment:

1,100.00 to \$5,500.00 \$ 5,500.00

Remarks \$5,500 was chosen as the penalty amount due to the potential adverse effects Dana is imposing on its employees and the environment.



Percentage change **Dollar Amount** 1. Good faith efforts to comply/ lack of good faith: 2. Degree of willfulness/neglect: 3. History of noncompliance/ compliance: 4. Other unique factors: Adjusted initial penalty (amount from Part II Adjusted per-day penalty (amount from Part II) Number of days of violation Multi-day penalty (line 6 x line 7) Economic benefit of noncompliance (attach separate \$ 5.500.00 5. 6.

7. 8. 9. worksheet) 10.

Total (lines 5 + 8 + 9)
Ability to pay adjustment
Total Penalty Amount: 11. 12. (may not exceed \$27,500 per day of violation)

Remarks: Compliance History: Signed:_

5.550.00

Date:_

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Name/ID: Dana Tansport Inc. NCD 074 505 850

Regulation Violated: 40 CFR 262.34(a)(4) codified at 15A NCAC 13A .0107

Part I. Degree or Extent of	of Harm (lactual or :	potential
-----------------------------	-----------	--------------	-----------

- Quantity of waste involved <u>Twelve (12) fifty-five gallon containers</u>
 Toxicity of waste involved <u>D001 and D008.</u> 1.
- 2.

4.

- 3. Is human life or health potentially threatened? yes X no __ Distance to residences unknown Number of people involved __15 employees_
- Media for exposure: air X groundwater X surface water X direct contact X

 Are other organisms potentially threatened? yes X no _

 Media for exposure: air X ground water X surface water X direct contact

 Are any environmental media potentially threatened? yes X no _ 5.
- air X groundwater X surface water X soil X 6. is the regulatory program adversely affected? yes X no _

Harm Cell: Major_X Moderate_ Minor_

Remarks: Dana failed to develop a training program for their employees on hazardous waste management. Employees did not take part in an annual review of the initial hazardous waste training as required. The facility could not produce records of job titles related to the handling of hazardous waste and written job descriptions for each position. Dana could not produce a written description of the type and the amount of both introductory and continuing training that would be given to each person filling a hazardous waste position and finally could not produce records to document that training or job experience required had been given to and completed by facility personnel. The inspector also noted that a revised list of emergency coordinators was not sent to the local police. It is department etc. In addition, the facility failed to its contingency plan to reflect a change in emergency coordinators.

Part II. Deviation from Regulations

Degree of noncompliance with overall regulations: substantial __ significant X_ in compliance except for cited violation

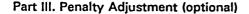
Deviation cell: Major X Moderate Minor

Remarks: 40 CFR 262,34(a) requires a generator to comply with Subparts C & D and 265,16, 265,16(a)(1) requires a generator to provide a training program in hazardous waste management, 265.16(c) requires a generator to annually train its employees to ensure they perform their duties and 265 6(d) requires a generator to comply with all training requirements and Subpart D contains the contingency plan requirements.

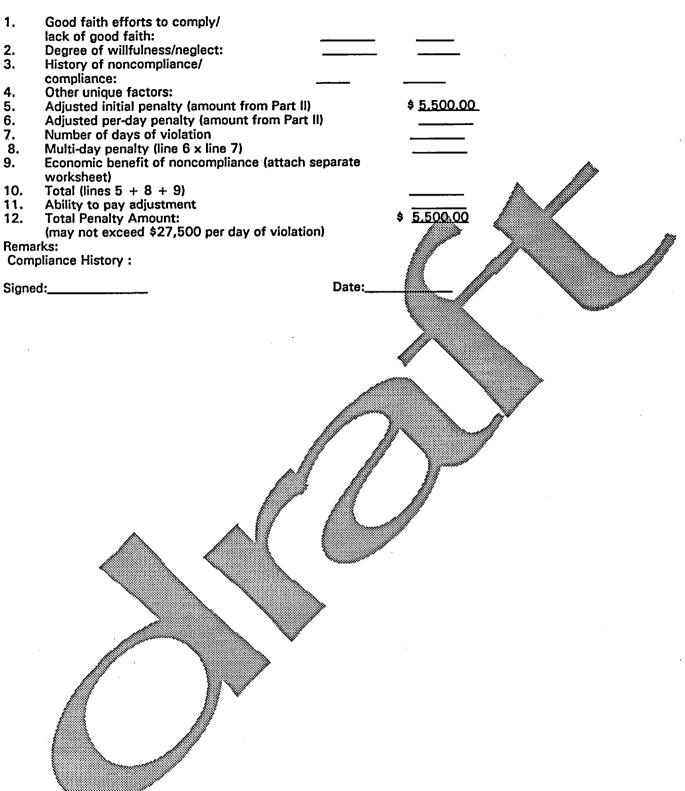
MATRIX CELL RANGE Penalty amount chosen Per Day Assessment:

1.100.00 to \$ 5.500.00 **\$** 5.500.00

Remarks \$ 5,500 was chosen as the penalty amount due to the potential adverse health and environmental effects Dana is imposing on the health of its employees and the environment.

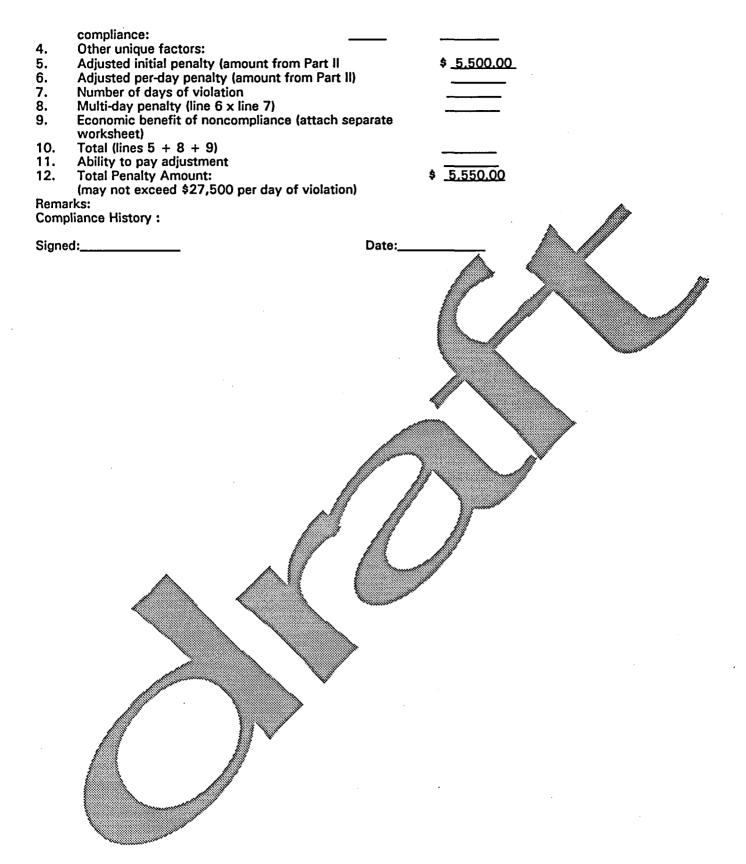


Percentage change Dollar Amount



PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE (Use Separate Sheet for Each Violation)

Regulation Violated: 40 CFR 268.7(a)(7)
Part I. Degree or Extent of Harm (actual or potential) 1. Quantity of waste involved <u>Tweleve (12) fifty-five gallon containers</u> 2. Toxicity of waste involved <u>D001 and D008</u> . 3. Is human life or health potentially threatened? yes <u>X</u> no
Part II. Deviation from Regulations 1. Degree of noncompliance with overall regulations:
substantial_X_ significant in compliance except for cited violation
Deviation cell: Major_X_ Moderate Minor
Remarks: 40 CFR 268.7(a)(7) requires generators to retain an on-site a copy of all notices, certifications, demonstrations, waste analysis data, analysis data, and other documentation produced pursuant to the Land Dispo
MATRIX CELL RANGE 7.100.00 to \$ 5.500.00
Penalty amount chosen: Per Day Assessment: **S.500.00** **Day Assessment:***
Remarks \$5,500 was chosen as the penalty because Dana is imposing on its employees and the environment.
Charge to Mid Mod 1760 1760 1760 1760
Part III. Penalty Adjustment (optional)
Percentage change Dollar Amount
1. Good faith efforts to comply/ lack of good faith: 2. Degree of willfulness/neglect: 3. History of noncompliance/



RCRA INSPECTION REPORT

(x= violation, na= not applicable)

	General Information: Facility Name DANA TRANSPORT, INC.
	Location 7254 MT. HOLLY ROAD, CHARLOTTE, N.C. 78714
	Mailing Address
	EPA I.D.# NCD 074 505 850 Phone # 704-399 - 3395
	Contact/ Title Robert MAYES
	Inspection Date June 23, 1997 Last Inspection January 28, 1997
	Status LARGE QUANTITY GENERATOR Type of Inspection CSE
	Waste Management Specialist(s) JOSEPH PARKER, JESSE WElls
	Present at Inspection MR. Robert HAYES - MANAGER
	Type of Business TANKER WAShING FACILITY
	Waste Generated Pool Dook Foos
₩ (Condition A - Waste Determination on unknown confamer - Completed, sent off as Hz. Waste
	Manifests:
	Approved Transporters? Approved TSD's?
	Signed Copies? Filled Out Correctly?
4	LDR Notification Attached? The facility has abtained LDR notices for
^	MANITEST #15 08296/8-9-96) and 68396(11-5-96). IN Compliance with
	CONDITION F
	Waste Minimization? How?
*	Hazardous Waste Inspection Records: Conditions B2 + B3 Inspections On Storage Area Good Ingrections. In Compliance with Condition B-2+3
•	Inspections On H.W. Tanks Wa
	Inspection On Ancillary Equipment NA
4	Contingency Plan: Condition E4 + E5 On Site? YES
	Any changes to facility/ processes or Emergency Coordinators since last review?
	Contingency Plan used? (if yes, was it adequate?)
•	Agreements with Emergency Responders? Need documentation to show Court. Plant was sent to Fire Dept., Police Dept
	+ Hospital.
*	Training Records: Condition E1, E2, and E3
	Certified Training Documents Available? YES, NEED to DAGANIZE BEHEL.
•	Any New Employees Since Last Review? No
	Evidence Of Improper/Inadequate Training? All Employees WAVE been teansed.
ntingen	cy Plan Content - FACILLY NEEDS to document what agreements they have with responding
	emergency services, i.e. Fre Dept., Police, Haptal. What roles will they fill in
	the event of an emergency.
AINING.	RECORDS - The facility has the appropriate type of training and documentation outsite.
	RECORDS - The facility has the appropriate type of training and documentation outsite. I recommend that they organize their training documentation into one manual, specific for HAZ. WASTE.
	for HAZ. WASTE.

Annual Report Submitted? Copy At Facil Emergency Preparedness: Facility Maintained And Operated To Prevent Releases? Internal Communications Or Alarm Present? Device In Area Of Operation To Summon Outside Help? Portable Fire Extinguishers And/ Or Fire Control Equipment Spill Control Equipment? Adequate Water Volume, Foam, Equipment, Or Auto Sprin All Equipment/ Alarms Tested And Maintained? All Personnel Handling H.W. Have Access To Alarm/ Device Aisle Space In Area Of Facility Operations?	•
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Satellite Accumulation Area(s) Z. Location(s) Both 50 container used for accumulation proposes - Both labeled As a hazardons waste and closed.	ce? <u>/&s</u>
contained used for accumulation purposes - Both labeled as a harardons waste and closed.	
	tellite Areas have 1-55 pallor containers are proposely
Containers: Closed? Labeled? <55 gal. Stored	
	✓ days if full?
Storage Area(s): 1 Description Draws the Reinspection Were observed to be IN storage. All containers were	17-55 gallow containers
Were observed to be IN storage. All confainers wer	e property impeled as a
MAZ. WASTE, dated with an accountiation start date	ed and closed
Containers: Closed? Aisle space? Labeled?	
Dated? <90 days? Good of	condition?
Other H.W. Units: (Applicable Regulations)	
Description of Unit	
External Facility Condition The facility has improved in handing their hazardons waste obsite.	since their last impedo

Follow Up Inspection: Comments		(date)
Follow Up Inspection:		(date)
Follow Up Inspection:		(date)
Follow Up Inspection:		(date)
	·	(date)
	·	(date)
	•	(date)
RCRA Inspector (date)	Facility Contact	(3-4-)
ball 1 6-23-97	(LENTIMED MAIL)	
documents.		
Hems are completed send this o	ffice ropies of those	updated
The FACILITY weeds to organize theis specific document for hazardon		
these revisions have been sent to	the Fire Dept. Police Dept.	and Mospital
D Ammeria the Gazility's Contingency D.	Ten to reflect the aggreen	ments defineed
Recommendations/ Continued		
		
6.) 40 CFR		
5.) 40 CFR		
4.) 40 CFR		
3.) 40 CFR		
2.) 40 CFR		
1.) 40 CFR		
Site Desiciencies:		
•		
Facility Name DANA TRANSPORT, INC. Inspection Date JUNE 23, 1997		



DANA CORPORATION

DANA TRANSPORT, INC DANA CONTAINER, INC DANA SYSTEM, INC

CONTINGENCY PLAN AND EMERGENCY PROCEDURES
CHARLOTTE FACILITY

REVISED 2/4/97 DAN BONANNI

INTRODUCTION

DANA CORPORATION OPERATES A TRUCKING AND TANK WASHING FACILITY. <u>SIC: 4213</u> THE EPA IDENTIFICATION NUMBER NCD074505850 IS ISSUED TO DANA CONTAINER AT 7254 MT. HOLLY RD., CHARLOTTE, NC 28214.

THE PURPOSE OF THIS DOCUMENT IS TO OUTLINE THE MANNER IN WHICH DANA WOULD RESPOND TO EMERGENCIES IN COMPLIANCE WITH 40 CFR 265.50 AND CHARLOTTE MECKLENBURG UTILITIES DEPARTMENT.

CONTINGENCY PLAN

Table of Contents

A.	Legal Requirements		
В.	Purpose and Implementation		

- C. Facility Personnel Actions
- D. General Actions
- E. Designated Emergency Coordinator
- F. Emergency Notifications
- G. Evacuation Plan
- H. Copies of Contingency Plans
- I. Amendments of Contingency Plans
- J. Emergency Coordinator Responsibilities

Command Post

Designated Spokesman

- K. Reporting of Incident
- L. Emergency Telephone Directory
- M. Chemical Inventory
- N. Personal Telephone Directory
- O. NPDES Permit
- P. Site, Quad Map

A. Legal Requirements (40 CFR Parts 265.50-52. Sub-parts C & D and Parts 265.16).

This contingency plan is required for spill prevention, contingency planning, and emergency response for spills and fires involving hazardous waste that is regulated under the Resource Recovery Act of 1976 "RCRA."

B. Purpose and Implementation (40 CFR Part 265.51).

The contingency plan "CP" is designed to minimize hazards to human health or environment from fires, explosions, or unplanned sudden or non-sudden release of hazardous waste or constituents to air, soil, or surface water.

40 CFR 265.51 (a). A copy of this plan must be present at the facility for personnel use and for inspection by governmental and commercial institutions.

40 CFR 265.51 (b). The provisions of this plan shall be carried out in a forthwith manner whenever there is a fire, explosion, or release of hazardous waste or constituents which could threaten human health or the environment.

C. Facility Personnel Actions (40 CFR 265.52 (a)). The CP must describe those actions personnel shall take to with respect to Sections 265.51 and 265.56 in response to the aforesaid emergencies.

D. General Actions.

When you discover a fire, explosion, or release of hazardous material:

- All operations shall cease and personnel shall initiate emergency procedures either to abate the aforesaid matter or initiate evacuation plans and procedures. Notifications shall be announced on Dana's telephone paging system.
- Dana shall further utilize said paging system, which is audible throughout the facility, to announce the emergency and further provide instructions to personnel with assistance from the EC primary/secondary via handheld radios.

1. Fire and Explosion Emergencies

- a. Do not panic!
- b. Sound alarm, notify the dispatch office, environmental affairs office or Dana at reception of the nature of emergency. Someone will summon emergency assistance.
- c. Don protective clothing "PPE" or evacuate the area.

d. (So, if you are still here?)

1. Try to extinguish the fire with provided emergency equipment. Dana Transport maintains dry chemical fire extinguishers and a fire water system which can adequately respond to any emergencies in the area of the hazardous waste management unit. Water hoses used in the wash bay area can be used for fire fighting around the separator and container areas. In addition to the fire water system, fire extinguishers are located throughout the facility buildings in each corner of the wash bays and maintenance area.

The aforesaid equipment is located on figure 2C.

2. Spill Response

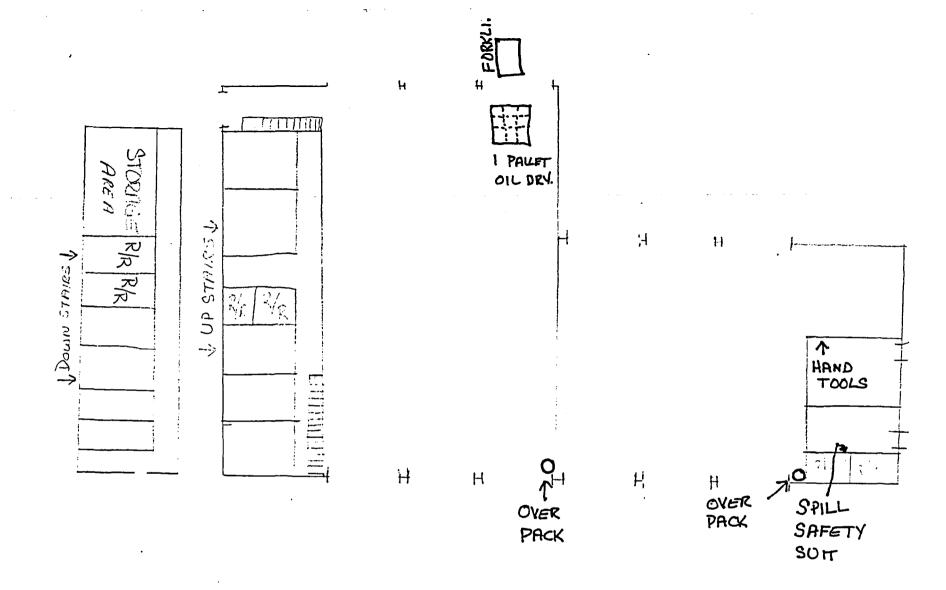
a. Initiate the same procedures as listed in D 1. However, further action should be taken to contain the spill or release. Moreover, abatement contractor should be notified to initiate release cleanup operations.

B.1. Spill Response Equipment

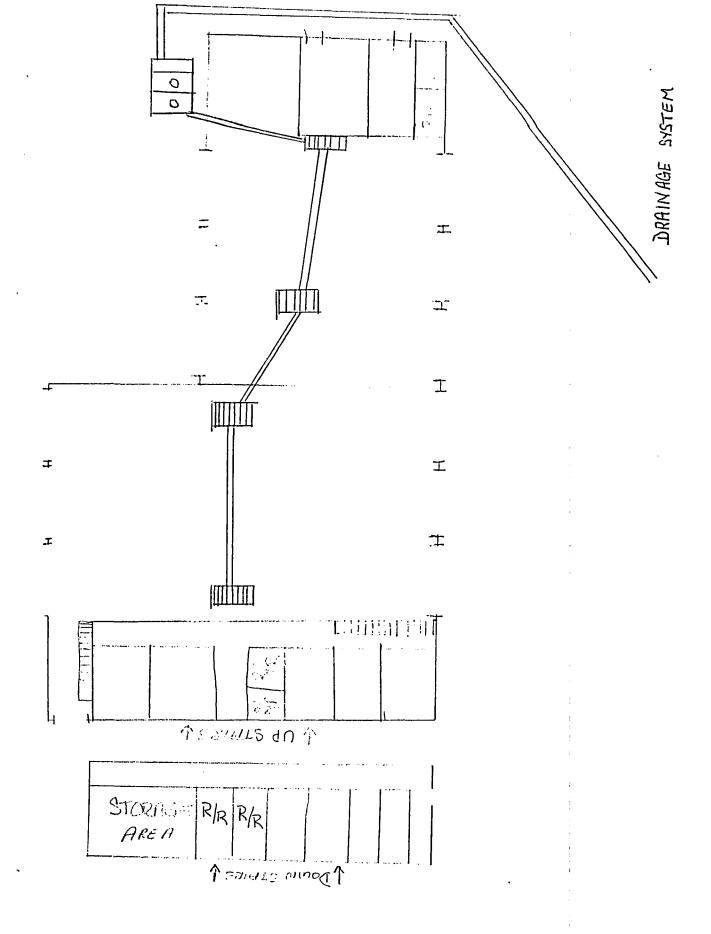
Front loader, fork lift, oil dry, all hand tools needed.

The most effective program to reduce the risk and cost of spills is an energetic and comprehensive spill prevention program that includes secondary containment for tanks and process systems along with regular inspections (40 CFR 265.174) and testing of tanks and lines for integrity. As stated in 40 CFR 265.15 General Inspection(s) Requirements, facility operators must inspect said facility for malfunctions and deterioration and correct same. NOTE: 40 CFR 265.174 states that containers/Drums must be inspected for integrity as follows:

- Daily discharge systems
- Daily gauges, pressure and temperature
- Daily level of tanks
- Weekly construction of tank, dikes and spill containment



SPILL RESPONSE EQUIPMENT & SUPPLIES



265.52 (E) Emergency Equipment

The plan shall include a list of all required emergency equipment at the facility. This list shall be kept up-to-date. In addition, the plan shall include the location and a physical description of each item and the list and a brief outline of its capabilities.

Table PP1. FIRE, SPILL CONTROL AND DECONTAMINATION EQUIPMENT

Item/Location	Size Quantity	<u>Use</u>
Fire Extinguisher Figure 1	10 lb/11	Extinguish Class A, B or C fires
First aid kit/oxygen/fresh ai Office	r	In or just outside tank wash office
Absorbent Cleaning Rack (oil dry) (shop)	55 Gallon Drum/2	Absorb spilled liquids Contain liquids
Diaphragm Pump Treatment Plant Cleaning Rack	1	General pumping needs Has capacity to pump damp small solids
pH. Tape Treatment Area	1	Used to measure pH of liquids

Shovel/Rakes 2
Drum Room (Cleaning Rack

Dry Bed)

Spreading Soil and ABSORBENT

Clean up

55 Gallon Drums

For disposal of contaminated

after spill clean-up

Tool Box

Shop

1

3

Fixing leaks

Pump Room

Decontamination Equipment: Stored in the Treatment Plant

55 Gallons Tubs

3

For decon solution A

and rinse solution

Large sponge

and brush

2 For Cleaning Equipment

Five (5) Gallon Buckets

2 For Cleaning Equipment

Decon Solution

Tester:

The most effective program to reduce the risk and cost of spill is an energetic and comprehensive spill prevention program that includes secondary containment for tanks and process systems along with regular inspections (40 CFR 265.174) and testing of tanks and lines for integrity. As stated in 40 CFT 265.15 General Inspection(s) Requirements, facility operators must inspect said facility for malfunctions and deterioration and correct same. NOTE: 40 CFR 265.174 states that Containers/Drums must be inspected for integrity as follows:

- Daily-discharge systems
- Daily-gauges, pressure and temperature
- Daily-level of tanks
- Weekly-construction of tank, dikes and spill containment

NOTE: Attached example of logs here!

DANA TRANSPORT, INC. 19TH STREET WEST, PLANT ROAD NITRO, WV 35143

BEGINNING ACCUMULATION DATE:

INITIAL	DATE	PRODUCT	AMOUNT GALLONS	HAZARDOUS WASTE#	DRUM#	REMARKS
	,		•			
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	-					
	;					
	,					
	:					
	÷					
						
						

	•
SENT TO APPROVED DISPOSAL FACILITY DATE:	
NAME:	
ADDRESS:	PHONE:
DISPOSAL CONFIRMATION DATE:	

Exit Routes

The normal primary exit route for each building occupant will be by way of the nearest exit door to the outside of the building. Once outside the building, then proceed to join the primary or secondary evacuation routes depending upon the location of the hazard. Take all appropriate action to warn personnel in other buildings or areas if the possibility of wider scale involvement in the incident at hand seems possible.

Move to an assembly point that will be established several hundred feet in front of the main entrance to the facility. At this time, supervisors may determine if there are concerns about personnel or activities remaining in the building.

In the event that special considerations exist inside or outside the buildings which make it desirable to follow an alternate exit route, this information will be announced over the building public address system prior to the sounding of the evacuation alarm.

Sounding the Alarm

During regular working hours, any question concerning the possible need for a building evacuation is to be reviewed immediately with the highest ranking individual at the scene of the emergency. This individual is responsible for making the decision to initiate the problem found alarm and evacuate the building. Authority for initiating a site evacuation alarm rests with the emergency coordinator or his designate.

The Terminal Manager should also be advised as quickly as possible and his assistance enlisted in handling the incident.

During off-hour periods, the emergency coordinator or his designate has the responsibility for determining if evacuation is necessary and for the initiation of the evacuation alarm.

Re-entry After Evacuation

During normal working hours or off-hour periods, the final decision that the building is safe to re-enter will be made by the emergency coordinator. A site evacuation must be reported in the site log and copy of the report forwarded to the head office.

Evacuation Drill

An evacuation drill will be held for the site a least once each year in order to test the evacuation procedure and familiarize building occupants with emergency exits not normally used. Details of the evacuation drill will be entered in the training lob.

H. Copies of the Contingency Plan (40 CFR 265.53). A copy of CP and all revisions shall be maintained at the facility and submitted to all local police and fire departments, hospital, state and local emergency response team LEPCs that may be called upon to provide said service.

One copy shall remain with all managers. Furthermore, one CP shall be placed with the dispatch office. Another copy with Corporate Headquarters, Office of Environmental Affairs for audit purposes.

- I. Amendments of Contingency Plan (40 CFR 265.54). The aforesaid plan shall be reviewing and amended if the following occur:
 - Regulations are revised
 - CP fails in emergency
 - Change in facility design
 - Response necessary changes
 - List of emergency coordinators change
 - List of emergency equipment changes
- J. Emergency Coordinator Responsibilities (40 CFR 265.55-56).
 - 1. Before an Incident
 - a. Simulate incident and audits to test CP.
 - b. Ensure all shifts have responsible personnel who know how to effectuate shutdown procedures ad reentry and restart-up operation. Train personnel in the ensuing requirements of site access, emergency exits, status reporting, safety, first aid and decontamination matters.
 - c. Tour site with local authorities to approve CP.
 - d. Inspections as stated on 40 CFR 265.174.



The persons listed below apprear in the order in which they will assume responsibility/take action at an emergency incident.

Primary:

Bill Horvath

Day Home 704-399-3395 704-545-4395 1-800-283-1212

Beeper

pin# 8002480

Secondary:

Bob Hayes

Day Home 704-399-3395 704-895-0979 704-354-0706

Home Beeper AMBULANCE: FIRE: AND POLICE, CAN BE CONTACTED BY DIALING 911

THE STATE ENVIRONMENTAL PROTECTION AGENCY CAN BE CONTACTED BY DIALING (704) 336-5500.

SPILL RESPONSE: FOUR SEASONS ENVIRONMENTAL (704) 527-1293

F. Emergency Notifications.

Primary Spill Abatement Contractor:

Name:

Four Seasons Environmental, Inc.

Address:

4920 Old Pineville Road

Phone # (24/hrs)

527-1293

Local: (H)

Secondary Spill Abatement Contractor:

Name:

Spectrum-Nationwide Environmental, Inc.

Address:

117 Sylvania Avenue

Phone # (24/hr.)

334-2164

Beeper:

(704) 346-5451

Police Department:

Charlotte Police Department

Phone #:

"911" or 336-3190

Address:

618 North College Street

Charlotte, NC 28202

Fire Department:

Phone #:

"911" or 336-2441

Address:

600 E. Fourth Street (9th Floor CMGC)

Charlotte, NC 28202

Hospital:

Carolinas Medical Center

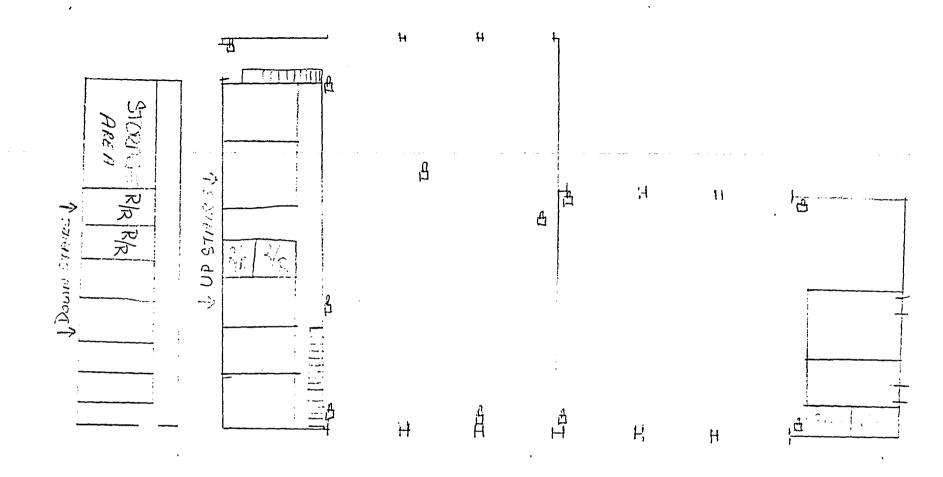
Phone #:

355-2000

Address:

1000 Blythe Boulevard

Charlotte, NC 28203



A FIRE EXTINGUISHING BOTTLES

Evacuation Drill 17

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 - 1. Before an Incident
 - a. Simulate incident and audits to test CP.
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 - c. Tour site with local authorities to approve CP.
 - d. Inspections as stated in 40 CFR 265.174.
 - 2. During an Incident
 - a. Activate internal alarm (40 CFR 265.32).
 - b. Immediately identify cause, character, amount, and real extent of any released material.

- c. Assess all hazards to human health or environment.
- d. Notify authorities.
- e. Evacuate local area.
- 3. Cleanup and Disposal

All hazardous materials shall be disposed of at a state approved RCRA TSDF.

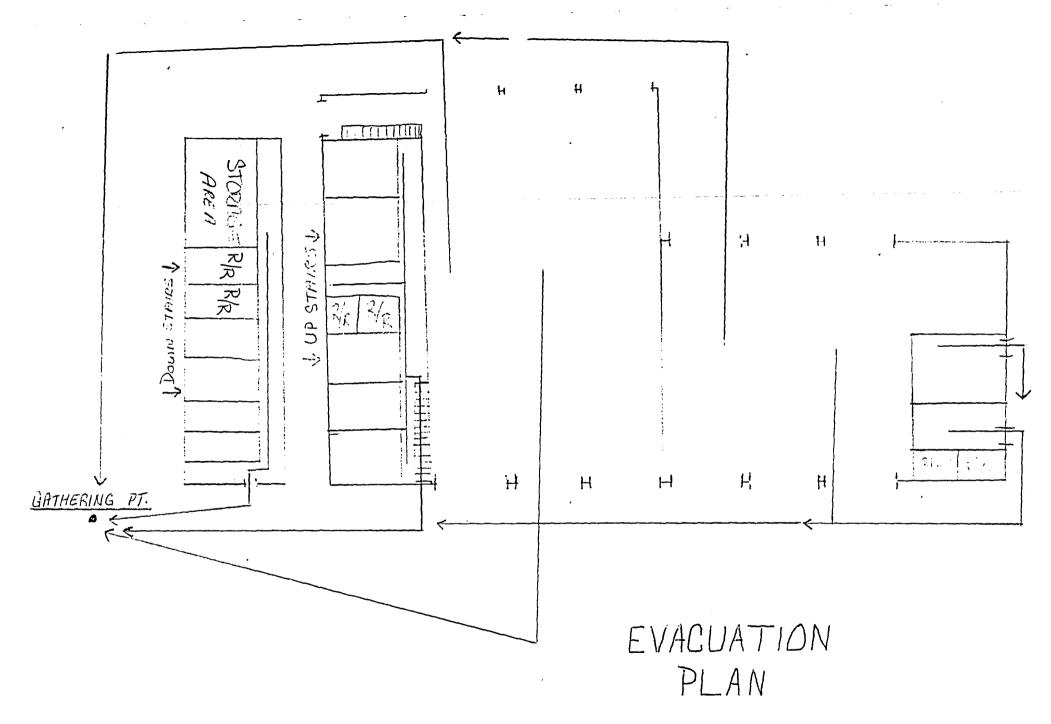
4. Command Post

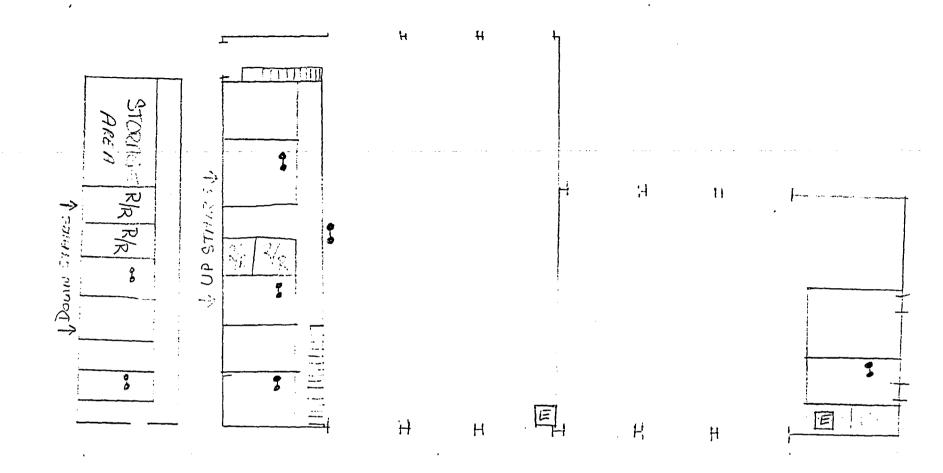
The command post should be removed from any hazard and have internal and external communications systems. For example, dispatch office - CP.

5. Designated Spokespersons

Mr. Ronald Dana, Mr. Daniel Bonanni, Director of Environmental Affairs and the facility manager, are designated as spokespersons to address public relations for the incident. All individuals must refer queries to the aforesaid individuals.

- K. Reporting of Incident. The facility manager, along with the assistance of the Office of Environmental Affairs, shall submit a written report to the respective State Department of Environmental Protection informing some of the incident in detail.
 - 1. Home address and telephone number of terminal manager, Director of Environmental Affairs.
 - 2. Address and telephone number of facility.
 - 3. Date, time, and type of incident.
 - 4. Material, quantity, and extent of environmental impact.
 - 5. Injuries.
 - 6. Disposition of site and disposal of material operations.





E ELECTRICAL

: PHONE

Alarm Signal

An evacuation alarm will be sounded by the alarm system. The alarm code is use at this facility is as follows:

Problem Found: * * * * * *

Signal blast of horn every three seconds repeated at least five times.

Evacuate facility: ** ** ** ** **

Two blasts of horn, one second apart, repeated at least five times with

three seconds between repeats.

All Clear: *** *** *** Three blasts of horn, one second apart, repeated at least five times with three seconds between repeats.

The telephones are available to summon assistance in the eventuality that only one individual is present at the terminal during an emergency.

Respond to an alarm signal at once.

NOTE: A copy of Dana's evacuation plan is represented as Figure 7.

Before Leaving

Upon receipt of an evacuation alarm, in addition to leaving, each individual should take any immediate actions which may be advisable to secure his/her area and prevent secondary incidents from occurring. Shut down equipment. Turn off all flames. Throw the main breaker.

2. During an Incident

- a. Activate internal alarm (40 CFR 265.32).
- b. Immediately identify cause, amount, and a real extent of any release material.
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MATERIAL SAFETY DATA SHEET

HIBRETT PURATEX, 7001 WESTFIELD AVENUE, PENNSAUKEN, NJ 08110
PHONE NUMBER: (609)662-1717
EMERGENCY PHONE NUMBER: (800) 424-9300

TRADE NAME OF PRODUCT: KETTLE CLEANER ___________ HAZARDOUS COMPONENTS >70 Sodium Hydroxide CAS 1310-73-2 PEL=2 mg/m3 (20 Silicic acid, disodium salt PEL= 2 mg/m3 as TWA CAS 6834-92-0 PHYSICAL DATA BOILING PT. (DEG f): NA SPECIFIC GRAVITY: POWDER SOLUBILITY IN WATER: INFINITE % VOLATILE: NA POWDER VAPOR DENSITY (AIR=1): NA EVAPORATION RATE: NA APPEARANCE AND ODOR: WHITE FREE FLOWING POWDER. FIRE AND EXPLOSION HAZARD DATA FLASH POINT (METHOD USED): NA FLAMMABLE LIMITS: NA EXTINGUISHING MEDIA: This product is not combustible. Water spray, foam, carbon dioxide or dry chemical may be used in areas where the product is stored. SPECIAL FIRE FIGHTING PROCEDURES: Protective clothing and pressure demand, self-contained breathing apparatus should be worn by fire fighters in areas where product is stored. UNUSUAL FIRE AND EXPLOSION HAZARDS: See reactivity HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: 2 mg/m3

HEALTH HAZARD INFORMATION: INHALATION: Airborne concentrations of dust, mist, or spray of this product may cause damage to the upper respiratory tract and even to the lung tissue which could produce chemical pneumonia depending on severity of exposure. SKIN: This product is destructive to tissues contacted and produces severe burns. EYES: Destructive to eye tissue on contact. Will cause severe burns that result in damage to the eyes and even blindness. INGESTION: Can cause severe burns and complete tissue perforation of mucous membranes of the mouth, throat esophagus and stomach.

MATERIAL SAFETY DATA SHEET; HIBRETT PURATEX, PENNSAUKEN, NJ

TRADE NAME OF PRODUCT KETTLE CLEANER PAGE 2

HAZARD RATING SCALE: 4=EXTREME; 3=HIGH; 2=MODERATE; 1=INSIGNIFICANT

TOXICITY: 3; FIRE: 1; REACTIVITY: 2

EMERGENCY AND FIRST AID PROCEDURE: EYES: Object is to flush material out immediately then seek medical attention. Immediately flush eyes with large amounts of water for at least 15 minutes, holding lids apart to ensure flushing of the entire surface. Washing eyes within several seconds is essential to achieve maximum effectiveness. Seek medical attention immediately. SKIN: immediately wash contaminated area with plenty of water for 15 minutes. Remove contaminated clothing and footwear and wash clothing before reuse. Discard footwear which cannot be decontaminated. Seek medical attention immediately. INHALATION: Get person out of contaminated area to fresh air. If breathing has stopped, resuscitate and administer oxygen if readily available. Seek medical attention immediately. INGESTION: Never give anything by mouth to an unconscious person. If Swallowed DO NOT INDUCE VOMITING. Give large quantities of water. If available, give several glasses of milk. If vomiting occurs spontaneously, keep airway clear. seek medical attention immediately.

REACTIVITY DATA

STABILITY: Material is stable

CONDITIONS TO AVOID: Avoid contact with water. This product may be added slowly to water or acids with dilution and constant stirring to avoid a violent exothermic reaction. When handling this product, avoid contact with aluminum, tin, zinc, and alloys containing these metals. Do not mix with strong acids without dilution and agitation to prevent violent reaction.

(materials to avoid): SEE ABOVE

HAZADDANG DEGAMOGETTON ODODNOTE NOVE

HAZARDOUS DECOMPOSITION PRODUCTS: NONE

HAZARDOUS POLYMERIZATION: Material will not polymerize.

CONDITIONS TO AVOID:

KEEP IN DRY, COOL PLACE IN ORIGINAL CONTAINER. KEEP TIGHTLY COVERED.

SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Leaks should be stopped Spills should be contained and cleaned up immediately. Spills should be removed by using a vacuum truck. Neutralize remaining traces of material with any dilute inorganic acid such as hydrochloric.

MATERIAL SAFETY DATA SHEET; HIBRETT PURATEX, PENNSAUKEN, NJ

PAGE 3

TRADE NAME OF PRODUCT KETTLE CLEANER

treatment/drainage systems and natural waterways.

sulfuric, phosphoric and acetic acids. The spill area should then be flushed with water followed by liberal covering of sodium bicarbonate. All clean up material should be removed and placed in approved containers, labeled and stored in a safe place to await proper treatment or disposal. Spills on other than pavement, e.g. dirt or sand may be handled by removing the affected soils and placing in approved containers. Persons performing clean up work should wear adequate personal protective equipment and clothing. Prevent spilled material from entering sewers, storm drains, other unauthorized

WASTE DISPOSAL METHOD: Package, store, transport and dispose of all clean up materials and any contaminated equipment in accordance with all applicable federal, state and local health environmental regulations.

SPECIAL PROTECTION INFORMATION:

RESPIRATORY PROTECTION Use NIOSH/MSHA approved respirator where dust, mist or spray may be generated.

VENTILATION: Use adequate local exhaust ventilation where dust, mist, or spray may be generated.

PROTECTIVE GLOVES: Impervious gloves should be worn. Gloves may be decontaminated by washing with mild soap and water. Natural and butyl rubber have been suggested.

EYE PROTECTION: Face shield and goggles or chemical goggles should be worn.

OTHER PROTECTIVE EQUIPMENT: Coveralls closed to the neck. Chemically resistant shoes and apron.

SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: KEEP CONTAINER TIGHTLY CLOSED. STORE AWAY FROM WATER AND ACIDS. WHEN MAKING SOLUTIONS ADD SLOWLY TO SURFACE OF WATER TO AVOID SPATTERING. KEEP OUT OF REACH OF CHILDREN. STORE IN COOL, DRY AREA.

OTHER PRECAUTIONS: DANGER - CONTAINS SODIUM HYDROXIDE (CAUSTIC SODA) HARMFUL OR FATAL IF SWALLOWED. PROTECT SKIN, EYES AND MUCOUS MEMBRANES FROM CONTACT WITH THIS PRODUCT. CAUSES SEVERE BURNS. WEAR RUBBER GLOVES, GOGGLES OR FACE SHIELD AND PROPER PROTECTIVE CLOTHES. DO NOT GET INTO EYES, ON SKIN, ON CLOTHING. AVOID BREATHING DUST, MIST OR SPRAY. DO NOT TAKE INTERNALLY. USE WITH ADEQUATE VENTILATION. WASH THOROUGHLY AFTER HANDLING OR CONTACT - EXPOSURE CAN CAUSE BURNS

MATERIAL SAFETY DATA SHEET; HIBRETT PURATEX, PENNSAUKEN, NJ

TRADE NAME OF PRODUCT KETTLE CLEANER

The manufacturer makes no warranties, express or implied, as to the accuracy or adequacy of the information contained herein. The manufacturer shall not be liable to the vendee, the vendees employees or anyone for any direct, special or consequential damages arising out of or in connection with the accuracy, adequacy or furnishing of such information. It is for the purchaser to decide whether said information is suitable for the purchaser's purposes. No warranty of merchantability, fitness for any particular purpose is expressed or implied regarding the accuracy or completeness of this information., the results to be obtained from the use of this information or the product, the safety of this product, or the hazards related to its use. This information and product are furnished on the condition that the person receiving them shall make his own determination as to the suitability of the product for his particular purpose and on the condition that he assume the risk of his use thereof.

************* MATERIAL SAFETY DATA SHEET ************

Costic

SECTION 1

PRODUCT IDENTIFICATION

PRODUCT NAME: CSS-8900 TANK CLEANER

GENERIC NAME: ANHYDROUS SODIUM HYDROXIDE

SUPPLIERS NAME: CHEMICAL SERVICE & SUPPLY

SUPPLIERS ADDRESS: 2920 RT. 35 EAST WINFIELD, WV 25213

PROPER SHIPPING NAME: SODIUM HYDROXIDE, SOLID

CHEMICAL FAMILY: ALKALI

EFFECTIVE DATE: 8/92

PHONE #: 800-925-8958

HEALTH

FIRE REACTIVITY

SECTION 2

INGREDIENTS

PEL TWA-TLV CHEMICAL NAME CAS# WT.% CAR. SODIUM HYDROXIDE 1310-73-2 0 - 752mg/M3 C2mg/M3 NO SODIUM METASILICATE 6834-92-0 0-10 NO SODIUM CARBONATE 497-19-8 0 - 15NO

SECTION 3

PHYSICAL DATA

OILING RANGE: N/A

.APOR PRESSURE: N/A

% VOLATILE: N/A

SOLUBILITY IN WATER: COMPLETE

N/A

SPECIFIC GRAVITY:

VAPOR DENSITY: N/A

MELTING POINT: DECOMPOSES 131 F

EVAPORATION RATES: N/A

PHYSICAL DESCRIPTION: WHITE GRANULAR POWDER, NO ODOR

SECTION 4

FIRE AND EXPLOSION HAZARD

FLASH POINT: N/A

FLAMMABLE LIMITS:

EXTINGUISHING MEDIA: N/A

SPECIAL FIRE FIGHTING PROCEDURES: NONE

METHOD USED: NONE

UNUSUAL FIRE & EXPLOSION HAZARDS: CONTACT WITH SOME METALS PARTICULARLY

MAGNESIUM, ALUMINUM, AND ZINC (GALVANIZED) CAN RAPIDLY GENERATE

HYDROGEN, WHICH IS EXPLOSIVE. LOWER EXPLOSIVE LIMIT: N/A

SECTION 5

REACTIVITY DATA

STABILITY: Stable HAZARDOUS POLYMERIZATION: Will Not Occur INCOMPATIBILITY (MATERIALS TO AVOID): STRONG ACIDS, LEATHER, WOOL, ALUMINUM AND ZINC.

HAZARDOUS DECOMPOSITION PRODUCTS: WITH METALS, CAN CAUSE FLAMMABLE TYDROGEN GAS. REACTION WITH VARIOUS FOOD SUGARS MAY FORM CARBON ONOXIDE.

SECTION 6

STORAGE AND HANDLING

PRECAUTIONS TO BE TAKEN IN HANDLING & STORAGE: KEEP OUT OF REACH OF CHILDREN. FOR USE BY TRAINED PERSONNEL ONLY. KEEP CONTAINER CLOSED DURING STORAGE. FOR INSTITUTIONAL & INDUSTRIAL USE ONLY. PROTECT CONTACT LENSES. AVOID CONTACT WITH ACIDS OR WATER.

SECTION 7

HEALTH AND FIRST AID

EFFECTS OF OVEREXPOSURE:

PRIMARY ROUTE OF ENTRY:

SKIN: SEVERE SKIN IRRITANT. DUSTS ARE EXTREMELY CORROSIVE TO THE SKIN AND RAPIDLY CAUSE SEVERE CHEMICAL BURNS. MOISTURE ON THE SKIN, SUCH AS PERSPIRATION, WILL ACCELERATE TISSUE DESTRUCTION.

EYES: DUSTS ARE EXTREMELY CORROSIVE TO THE EYES. BRIEF CONTACT CAUSES SEVERE EYE DAMAGE AND PROLONGED CONTACT CAUSES PERMANENT EYE INJURY WHICH MAY BE FOLLOWED BY BLINDNESS.

INHALATION: DUSTS ARE EXTREMELY CORROSIVE TO THE ENTIRE RESPIRATORY TRACT. BREATHING DUST CAN DESTROY THE MUCOUS MEMBRANE AND CAN CAUSE SEVERE PNEUMONITIS.

INGESTION: DUSTS OR SOLIDS ARE EXTREMELY CORROSIVE TO THE MOUTH AND THROAT. SWALLOWING DUSTS OR SOLIDS CAUSES SEVERE AND RAPID BURNING OF THE MOUTH, THROAT, AND DIGESTIVE TRACT ACCOMPANIED BY SEVERE PAIN, VOMITING AND COLLAPSE. SOME EFFECTS MAY BE DELAYED.

FIRST AID PROCEDURES:

SKIN: IMMEDIATELY FLUSH SKIN WITH LOTS OF WATER FOR 30 MINUTES. REMOVE CONTAMINATED CLOTHING AND SHOES. WASH BEFORE REUSE. GET IMMEDIATE IEDICAL ATTENTION.

EYES: IMMEDIATELY FLUSH EYES WITH LOTS OF RUNNING WATER FOR 30 MINUTES, LIFTING THE UPPER AND LOWER EYELIDS OCCIONALLY. GET IMMEDIATE MEDICAL ATTENTION.

INHALATION: REMOVE TO FRESH AIR. GIVE ARTIFICIAL RESPIRATION IF NOT BREATHING. GET INMEDIATE MEDICAL ATTENTION.

INGESTION: DO NOT INDUCE VOMITING. IF CONSCIOUS, GIVE LOTS OF WATER OR MILK. GET IMMEDIATE MEDICAL ATTENTION. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSING PERSON.

SECTION 8

SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: IF USE CONDITIONS GENERATE DUST, WEAR A NIOSH APPROVED RESPIRATOR APPROPRIATE FOR THOSE EMISSION LEVELS.

VENTILATION: LOCAL EXHAUST BELOW TLV

PROTECTIVE GLOVES: RUBBER GLOVES EYE PROTECTION: SAFETY GLASSES

OTHER PROTECTIVE EQUIPMENT: AS NEEDED TO PROTECT

SECTION 9

SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE OF SPILL OR LEAK: SWEEP UP, REUSE OR DISPOSE. PLACE IN CONTAINERS FOR SALVAGE OR WASTE. WASH RESIDUE WITH WATER. WASTE DISPOSAL METHOD: DISPOSE IN ACCORDANCE WITH FEDERAL, STATE, AND OCAL REGULATIONS.

MATERIAL SAFETY DATA SHEET

HIBRETT PURATEX, 7001 WESTFIELD AVENUE, PENNSAUKEN, NJ 08110 PHONE NUMBER: (609)662-1717 EMERGENCY PHONE NUMBER: (800) 424-9300

TRADE NAME OF PRODUCT: PANTHER FEBRUARY 1995

MIXTURES OF LIQUIDS, SOLIDS & GASES 2-BUTOXYETHANOL CAS 111-76-2 % TLY UNITS

<10 50 ppm

PHYSICAL DATA

BOILING PT. (DEG f): na SPECIFIC GRAVITY: 1.05

SOLUBILITY IN WATER: infinite

VAPOR DENSITY (AIR=1): na EVAPORATION RATE: na

APPEARANCE AND ODOR: CLEAR LIQUID WITH LIGHT RED COLOR

FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (METHOD USED): non flammable

"LAMMABLE LIMITS: non flammable

EXTINGUISHING MEDIA: IF exposed to fire from another source, use extinguishing media suitable for that source.

SPECIAL FIRE FIGHTING PROCEDURES: Fire fighters and others who may be exposed to products of combustion should wear full protective clothing including self contained breathing apparatus.

UNUSUAL FIRE AND EXPLOSION HAZARDS: none

HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: not determined

EFFECTS OF OVEREXPOSURE: Concentrated product can be harmful to body tissue. May cause skin irritation. Prolonged or repeated exposure may cause redness, burning and drying of the skin. May cause eye irritation. Ingestion may cause irritation of throat, esophagus and tomach.

MATERIAL SAFETY DATA SHEET: HIBRETT PURATEX, PENNSAUKEN, NJ

TRADE NAME OF PRODUCT PANTHER	PAGE 2
EMERGENCY AND FIRST AID PROCEDURE: EXTER eyes with large amount of water for at 1 apart to insure flushing of entire eye. medical aid. SKIN: Immediately wash con for 15 minutes. Remove contaminated clot before re-use, Discard shoes. If irrita INHALATION: Move to fresh air. If brea and administer oxygen if available. See immediately. INGESTION: Never give any unconscious person. If swallowed induce tablespoons syrup of ipecac. if unavaila and induce vomiting by touching finger t victims head below hips while vomiting. medical attention immediately.	east 15 minutes, hold lids If irritation persists seek taminated area with water hing and shoes. Wash clothing tion persists seek medical aid thing has stopped, resuscitate k medical attention thing by mouth to an vomiting by giving 2 ble give 2 glasses of water o back of victims throat. Keep
REACTIVITY DATA	
STABILITY ==== This product is stable	
CONDITIONS TO AVOID: Do not mix with any acids.	other cleaning products or
INCOMPATIBILITY (materials to avoid): Do other cleaning chemicals.	not mix with acids or any
HAZARDOUS DECOMPOSITION PRODUCTS: Carbon organic compounds may be released during	
HAZARDOUS POLYMERIZATION: WILL NOT O	ccur:
CONDITIONS TO AVOID: none	
SPILL OR LEAK PROC	
STEPS TO BE TAKEN IN CASE MATERIAL IS REI	

absorbent into suitable container for disposal. Flush area with water to remove trace residue. Dispose of flush solution in accordance with all local, state and federal regulations.

MATERIAL SAFETY DATA SHEET: HIBRETT PURATEX, PENNSAUKEN, NJ

ADE NAME OF PRODUCT: PANTHER

SPECIAL PROTECTION INFORMATION:

RESPIRATORY PROTECTION (specify type): none normally needed.

VENTILATION: For general ventilation, at least 10 air changes per hour recommended. Local exhaust required in storage areas if needed to control vapor.

PROTECTIVE GLOVES: rubber, neoprene

EYE PROTECTION: safety goggles and/or face shield.

OTHER PROTECTIVE EQUIPMENT: none

SPECIAL PRECAUTIONS

ECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Keep container closed when not in use. Store in cool, dry area. Do not mix with other chemicals. Avoid contact with material. Keep out of reach of children. Wash hands before eating or smoking.

OTHER PRECAUTIONS: none

The manufacturer makes no warranties, express or implied, as to the accuracy or adequacy of the information contained herein. The manufacturer shall not be liable to the vendee, the vendees employees or anyone for any direct, special or consequential damages arising out of or in connection with the accuracy, adequacy or furnishing of such information. It is for the purchaser to decide whether said information is suitable for the purchaser's purposes. No warranty of merchantability, fitness for any particular purpose is expressed or implied regarding the accuracy or completeness of this information, the results to be obtained from the use of this information or the product, the safety of this product, or the hazards related to its use. This information and product are furnished on the condition that the person receiving them shall make his own determination as to the suitability of the product for his particular purpose and on the condition that he assume the risk of his use thereof.

Route 1680X 2894 Bliberty Texas

MATERIAL SAFETY DATA SHEET

MSDS NUMBER:

1B00101

MSDS DATE:

1/1/96

PRODUCT NAME:

1B CONCENTRATE

EMERGENCY PHONE NUMBER - INFOTRAC - 24 HOUR #800-535-5053

I. PRODUCT IDENTIFICATION

MANUFACTURER'S

FLEETCLEAN SYSTEMS INC

TELEPHONE

NAME AND ADDRESS

ROUTE 1 BOX 289 LIBERTY, TEXAS 77575

(409) 298 - 9835

CHEMICAL CLASS:

INORGANIC ACID CLEANING

CAS NUMBER:

NONE FOR

COMPOUND

MIXTURE

DOT PROPER SHIPPING NAME: CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S.,

(CONTAINS HYDROFLUORIC ACID AND PHOSPHORIC ACID)

DOT HAZARD CLASS: CORROSIVE 8 - REPORTABLE QUANTITY IN SPILLS

EXCEEDING 250 GALLONS

DOT I.D. NUMBER: UN3264

HAZARDOUS INGREDIENTS:

HYDROFLUORIC ACID, PHOSPHORIC ACID

II. HAZARDOUS INGREDIENTS

MATERIAL OR COMPONENT

HAZARD DATA

CAS NUMBER

HYDROFLUORIC ACID 70%

PEL: 3 PPM

TLV: 3 PPM

7664-39-3

8-12

PHOSPHORIC ACID

2 - 5

CAS = CHEMICAL ABSTRACT SERVICE NUMBER

NC = NO RELEVANT INFORMATION OR NOT AVAILABLE

PEL = OSHA PERMISSIBLE EXPOSURE LIMIT

NA = NOT APPLICABLE

TLV = ACGIH THRESHOLD LIMIT VALUE.CURRENT

CEL = CORPORATE EXPOSURE LIMIT

IMPORTANT: THE INFORMATION PRESENTED HEREIN IS BELIEVED TO BE RELIABLE. HOWEVER NO WARRANTY, EXPRESSED OR IMPLIED IS MADE AS TO ITS ACCURACY OR COMPLETENESS, AND NONE IS MADE AS TO THE FIRNESS OF THE MATERIAL FOR ANY PURPOSE. THE MANUFACTURE SHALL NOT BE LIABLE FOR DAMAGES TO PERSON OR PROPERTY RESULTING FROM ITS USE. NOTHING HEREIN SHALL BE CONSTRUED AS A RECOMMENDATION FOR USE IN VIOLATION OF ANY PATENT.

1B00101

MSDS DATE:

1/1/96

PRODUCT NAME:

1B CONCENTRATE

III. HEALTH HAZARD INFORMATION

EMERGENCY AND FIRST AID PROCEDURES

PAGE 2 OF 4

SKIN: FLUSH GENTLY WITH COOL WATER AND UNDER NAILS FOR A MINIMUM FOR 15 MINUTES. IMMERSE IN SOLUTION OF 0.13% ICE AQEOUS ZEPHIRAN CHLORIDE. IF IMMERSION IS NOT PRACTICAL, APPLY COMPRESSES SOAKED IN ZEPHIRAN CHLORIDE. CALL PHYSICAN IMMEDIATELY.

EYES: IRRIGATE EYES FOR AT LEAST 15 MINUTES WITH LARGE QUANTITIES OF COOL WATER, KEEPING EYELIDS APART AND AWAY FROM EYEBALLS DURING IRRIGATION. GET IMMEDIATE MEDICAL ATTENTION.

INGESTION: DO NOT INDUSE VOMITING. DRINK LARGE AMOUNTS OF WATER. GET IMMEDIATE MEDICAL ATTENTION.

INHALATION: MOVE PERSON TO FRESH AIR. KEEP HIM LYING DOWN, QUIET AND WARM. GET IMMEDIATE MEDICAL ATTENTION.

ROUTES OF EXPOSURE

INHALATION: AIRBORNE CONCENTRATION OF MIST OR SPRAY CAN IRRITATE THROAT AND RESPIRATORY SYSTEM.

SKIN: LIQUID AND VAPOR CAN CAUSE SEVERE BURNS WHICH MAY NOT BE IMMEDIATELY PAINFUL OR VISIBLE.

EYES: BOTH LIQUID AND VAPOR CAN CAUSE IRRITATION AND CORNEA BURNS.

INGESTION: CAN CAUSE SEVERE MOUTH, THROAT AND STOMACH BURNS.

EFFECTS OF OVEREXPOSURE

THE MATERIALS IN THIS PRODUCT ARE NOT LISTED IN THE TSCA INVENTORY AS CARCINOGENIC BY IARC, NTP, OSHA, ACGIH.

1B00101

MSDS DATE:

1/1/96

PRODUCT NAME:

1B CONCENTRATE

IV. FIRE AND EXPLOSION DATA

FLASH POINT:

NON FLAMABLE

AUTOIGNITION TEMPERATURE:NA

PAGE 3 OF 4

FLAMABLE LIMITS IN AIR, % BY VOLUME UPPER:

LOWER: NA

EXTINGUISHING MEDIA: USE WATER OR SUITABLE AGENT TO FIRES ADJACENT

NON-LEAKING CONTAINERS. DO NOT USE SOLID WATER STREAMS NEAR

RUPTURES CONTAINERS OR SPILLS OR HYDROFLUORIC ACID.

SPECIAL FIRE FIGHTING PROCEDURES: WEAR SELF-CONTAINED BREATHING

APPARATUS APPROVED BY THE NIOSH AND FULL PROTECTIVE CLOTHING. USE

WATER SPRAY TO KEEP CONTAINERS COOL.

UNUSUAL FIRE AND EXPLOSION HAZARD REACTION WITH METALS GENERATES

FLAMMABLE AND POTENTIALLY EXPLOSIVE HYDROGEN GAS. HEAT INCREASES

PRESSURE AND MAY EXPLODE CONTAINERS.

V. SPECIAL PROTECTION

VENTILATION:

LOCAL EXHAUST SUFFICIENT TO REDUCE VAPOR AND ACID MIST

BELOW PERMISSIBLE TLV LEVELS.

VI. PHYSICAL DATA

BOILING POINT:

66 C

SPECIFIC GRAVITY:

1.258

VAPOR PRESSURE: APPROXIMATELY 110 MM HG @ 20 C

SOLUBILITY IN WATER:

COMPLETE

PH:

1.4

APPEARANCE AND ODOR:

BLUE LIQUID WITH DISTINCT PUNGENT ACIDIC AROMA

VII. REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY: UNDER NORMAL CONDITIONS

PRODUCT IS STABLE.

INCOMPATIBILITY:

STORAGE IN ALUMINUM, ZINC, AND MOST METALS WHICH YIELD

HYDROGEN GAS, A FIRE AND EXPLOSIVE HAZARD.

HAZARDOUS DECOMPOSITION PRODUCTS:

NONE

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION:

MATERIAL

IS NOT KNOWN TO POLYMERIZE.

1B00101

MSDS DATE:

1/1/96

PRODUCT NAME:

1B CONCENTRATE

VIII. HANDLING AND STORAGE

DO NOT GET IN EYES, ON SKIN AND ON CLOTHING. DO NOT TAKE INTERNALLY. USE WITH ADEQUATE VENTILATION. WHEN EXPOSED TO CONCENTRATED VAPORS IN A CONFINED AREA, USE OF RESPIRATORY PROTECTION MAY BE NECESSARY. WHEN HANDLING, WEAR CHEMICAL SPLASH GOGGLES AND RUBBER GLOVES. WASH THROUGHLY AFTER HANDLING, AS EXPOSURE CAN CAUSE BURNS WHICH ARE NOT IMMEDIATELY PAINFUL OR VISIBLE. KEEP CONTAINERS TIGHTLY CLOSED. STORE IN COOL DRY LOCATION AWAY FROM INCOMPATIBLE MATERIALS. DO NOT ADD WATER TO ACID; INSTEAD, DILUTE BY ADDING ACID TO WATER CAUTIOUSLY AND WITH AGITATION.

PAGE 4 OF 4

IX ENVIRONMENTAL PROCEDURES

DO NOT GET IN EYES, ON SKIN AND ON CLOTHING. DO NOT TAKE INTERNALLY. USE WITH ADEQUATE VENTILATION. WHEN EXPOSED TO CONCENTRATED VAPORS IN A CONFINED AREA, USE OF RESPIRATORY PROTECTION MAY BE NECESSARY. WHEN HANDLING, WEAR CHEMICAL SPLASH GOGGLES AND RUBBER GLOVES. WASH THROUGHLY AFTER HANDLING, AS EXPOSURE CAN CAUSE BURNS WHICH ARE NOT IMMEDIATELY PAINFUL OR VISIBLE. KEEP CONTAINERS TIGHTLY CLOSED. STORE IN COOL DRY LOCATION AWAY FROM INCOMPATIBLE MATERIALS. DO NOT ADD WATER TO ACID; INSTEAD, DILUTE BY ADDING ACID TO WATER CAUTIOUSLY AND WITH AGITATION.

STEPS TO BE TAKEN IF MATERIAL LEAKS OR IS SPILLED: NEUTRALIZE WITH LIME SLURRY OR SODA ASH. PROVIDE PLENTY OF VENTILATION. DISPOSE OF RESIDUE IN ACCORDANCE WITH APPLICABLE LOCAL DISPOSAL REGULATIONS. KEEP PRODUCT OUR OF STORM SEWER OR SANITARY SEWER.

WASTE DISPOSAL METHOD: TREAT TO DISPOSE OF ACCORDING TO REGULATIONS UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT AS ADMIN—ISTERED BY THE USEPA OR APPROPRIATE STATE AGENCY.

Roule Il Box 289 so vibert valexas 7.7575

MATERIAL SAFETY DATA SHEET

MSDS NUMBER:

2B00102

MSDS DATE:

1/1/96

PRODUCT NAME:

2B CONCENTRATE

EMERGENCY PHONE NUMBER - INFOTRAC - 24 HOUR #800-535-5053

I. PRODUCT IDENTIFICATION

MANUFACTURER'S

FLEETCLEAN SYSTEMS INC

TELEPHONE

NAME AND ADDRESS

ROUTE 1 BOX 289 LIBERTY, TEXAS 77575

(409) 298 - 9835

CHEMICAL CLASS:

INORGANIC ALKALINE CLEANING CAS NUMBER:

NONE FOR

COMPOUND, LIQUID

MIXTURE

DOT PROPER SHIPPING NAME: CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S.

(CONTAINS SODIUM HYDROXIDE AND TRISODIUM

NITRILOTRIACETATE).

DOT HAZARD CLASS: CORROSIVE 8 - REPORTABLE QUANTITY IN SPILLS

EXCEEDING 4000 GALLONS

DOT I.D. NUMBER: UN3266

HAZARDOUS INGREDIENTS:

SODIUM HYDROXIDE, TRISODIUM NITRILOTRIACETATE

II. HAZARDOUS INGREDIENTS

MATERIAL OR COMPONENT

HAZARD DATA

CAS NUMBER

%

SODIUM HYDROXIDE

PEL: NONE EST.

1310-73-2

2-5

TLV: 2 mg/m3

TRISODIUM NITRILOTRIACETATE

2 - 4

CAS = CHEMICAL ABSTRACT SERVICE NUMBER

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TLV = ACGIH THRESHOLD LIMIT VALUE, CURRENT

CEL = CORPORATE EXPOSURE LIMIT

IMPORTANT: THE INFORMATION PRESENTED HEREIN IS BELIEVED TO BE RELIABLE. HOWEVER NO WARRANTY,

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OF ANY PATENT.

MSDS NUMBER:

2B00102

MSDS DATE:

1/1/96

PRODUCT NAME:

2B CONCENTRATE

PAGE 2 OF 4

III. HEALTH HAZARD INFORMATION

EMERGENCY AND FIRST AID PROCEDURES

EYES:

IMMEDIATELY FLUSH WITH PLENTY OF WATER FOR 15 MINUTES, HOLDING

EYELIDS APART TO ENSURE FLUSHING OF THE ENTIRE EYE SURFACE. GET

IMMEDIATE MEDICAL ATTENTION.

SKIN:

IMMEDIATELY WASH WITH PLENTY OF WATER FOR 15 MINUTES. REMOVE

CONTAMINATED CLOTHING AND FOOTWEAR. GET IMMEDIATE MEDICAL

ATTENTION.

INHALATION:

REMOVE PERSON OUT OF CONTAMINATED AREA TO FRESH AIR.

GET IMMEDIATE MEDICAL ATTENTION.

INGESTION:

DO NOT INDUCE VOMITING. GIVE LARGE QUANTITIES OF WATER. IF

AVAILABLE, GIVE SEVERAL GLASSES OF MILK. GET IMMEDIATE MEDICAL

ATTENTION.

ROUTES OF EXPOSURE

INHALATION: AIRBORNE CONCENTRATION OF MIST, VAPOR OR SPRAY CAN IRRITATE THROAT AND RESPIRATORY SYSTEM.

SKIN: LIQUID CAN CAUSE BURNS WHICH MAY NOT BE IMMEDIATELY PAINFUL OR VISIBLE.

EYES: BOTH LIQUID AND VAPOR CAN CAUSE IRRITATION AND CORNEA BURNS.

INGESTION: CAN CAUSE SEVERE MOUTH, THROAT AND STOMACH BURNS.

E	FF	ECT	SOF	OVEREXPOSURE

THE MATERIALS IN THIS PRODUCT ARE NOT LISTED IN THE TSCA INVENTORY AS CARCINOGENIC BY JARC, NTP, OSHA, ACGIH.

2B00102

MSDS DATE:

1/1/96

PRODUCT NAME:

2B CONCENTRATE

IV. FIRE AND EXPLOSION DATA

FLASH POINT:

NON FLAMABLE

AUTOIGNITION TEMPERATURE:NA

PAGE 3 OF 4

FLAMABLE LIMITS IN AIR, % BY VOLUME UPPER:

LOWER: NA

NA

EXTINGUISHING MEDIA:

THIS PRODUCT IS NOT COMBUSTIBLE.

SPECIAL FIRE FIGHTING PROCEDURES: NONE

UNUSUAL FIRE AND EXPLOSION HAZARD:

NONE

V. SPECIAL PROTECTION

VENTILATION:

LOCAL EXHAUST SUFFICIENT TO REDUCE VAPOR AND ACID MIST

BELOW PERMISSIBLE TLV LEVELS.

VI. PHYSICAL DATA

BOILING POINT:

ND

SPECIFIC GRAVITY:

ND

VAPOR PRESSURE:

ND

SOLUBILITY IN WATER:

COMPLETE

PH:

12.8

APPEARANCE AND ODOR:

COLORLESS LIQUID WITH A PLEASANT FRUITY ODOR.

VII. REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY:

UNDER NORMAL CONDITIONS

PRODUCT IS STABLE.

INCOMPATIBILITY:

AVOID STORAGE IN ALUMINUM, TIN, ZINC, AND ALLOYS CONTAINING

THESE METALS.

HAZARDOUS DECOMPOSITION PRODUCTS:

NONE

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION:

MATERIAL

IS NOT KNOWN TO POLYMERIZE.

2B00102

MSDS DATE:

1/1/96

PRODUCT NAME:

2B CONCENTRATE

VIII. HANDLING AND STORAGE

DO NOT GET IN EYES, ON SKIN AND ON CLOTHING. DO NOT TAKE INTERNALLY. USE WITH ADEQUATE VENTILATION. WHEN EXPOSED TO CONCENTRATED VAPORS IN A CONFINED AREA, USE OF RESPIRATORY PROTECTION MAY BE NECESSARY. WHEN HANDLING, WEAR CHEMICAL SPLASH GOGGLES AND RUBBER GLOVES. WASH THROUGHLY AFTER HANDLING, AS EXPOSURE CAN CAUSE BURNS WHICH ARE NOT IMMEDIATELY PAINFUL OR VISIBLE. KEEP CONTAINERS TIGHTLY CLOSED. STORE IN COOL DRY LOCATION AWAY FROM INCOMPATIBLE MATERIALS.

PAGE 4 OF 4

IX ENVIRONMENTAL PROCEDURES

DO NOT GET IN EYES, ON SKIN AND ON CLOTHING. DO NOT TAKE INTERNALLY. USE WITH ADEQUATE VENTILATION. WHEN EXPOSED TO CONCENTRATED VAPORS IN A CONFINED AREA, USE OF RESPIRATORY PROTECTION MAY BE NECESSARY. WHEN HANDLING, WEAR CHEMICAL SPLASH GOGGLES AND RUBBER GLOVES. WASH THROUGHLY AFTER HANDLING, AS EXPOSURE CAN CAUSE BURNS WHICH ARE NOT IMMEDIATELY PAINFUL OR VISIBLE. KEEP CONTAINERS TIGHTLY CLOSED. STORE IN COOL DRY LOCATION AWAY FROM INCOMPATIBLE MATERIALS.

STEPS TO BE TAKEN IF MATERIAL LEAKS OR IS SPILLED: LEAKS SHOULD BE STOPPED. SPILLS SHOULD BE CONTAINED AND CLEANED UP IMMEDIATELY. NEUTRALIZE WITH ANY DILUTED INORGANIC ACID. THE SPILL AREA SHOULD THEN BE FLUSHED WITH WATER FOLLOWED BY LIBERAL COVERING OF SODIUM BICARBONATE. PERSONS PERFORMING CLEAN—UP WORK SHOULD WEAR ADEQUATE PROTECTIVE CLOTHING AND EQUIPMENT.

WASTE DISPOSAL METHOD: TREAT TO DISPOSE OF ACCORDING TO REGULATIONS UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT AS ADMIN—ISTERED BY THE USEPA OR APPROPRIATE STATE AGENCY.



THIS EMERGENCY REMEDIATION AND RESPONSE AGREEMENT (the "Agreement) is made this "CO day of Doo. 1994 by and between Days Contained a corporation with its principal office located in Gyene N. 3. (the "Customer") and FOUR SEASONS ENVIRONMENTAL, INC., A Corporation with its principal place of business located in Greensbore, North Carolina ("Four Seasons").

WITNESSETH:

WHEREAS, Four Seasons operates an environmental remediation service for the purpose of controlling and remediating environmental hazards:

WHEREAS, Four Seasons has agreed to respond to petroleum, chemical or hazardous amergencies of the customer to provide special control and cleanup services on the terms and conditions described herein below.

NOW THEREFORE, the parties hereto domereby agree as follows:

RESPONSE BY FOUR SEASONS. Upon notification of an authorized agent of the Customer, Four Seasons shall respond to petroleum, camical or hazardous materials emergencies (incident) at the facilities or other locations effected by the incident. Four Seasons will respond as quickly as possible when notified of an emergency under this agreement. However, due to the allocation of its resources at any given time, Four Seasons expressly makes no warranties or representations against any time period by which a response will be made.

AGREEMENT BY THE CUSTOMER. The Customer agrees to execute the standard Four Sessons waste service agreement (the "Waste Service Agreement"), a copy is attached hereto as Ethin A. within (24) hours after notifying Four Sessons of an emergency. Authorized personnel of Four Sessons and the Customer will define the scope of work in the Waste Service Agreement to provide for the control and subsequent remediation of any emergency.

Term. This Agreement shall be effective from the date of execution of both parties and will remain in effect until termination. Either party may terminate this Agreement within (30) days written notice to the other party.

AMENDMENT. This agreement may not be amended or supplemented except by a writing signed by the party whom such amendment or supplementation is sought to be enforced.

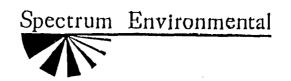
IN WITNESS WHEREOF, the parties hereto have executed this Agreement on this the day and year first above written.

CUSTOMER:

harly terrell T

FOUR SEASONS ENVIRONMENTAL. INC.:

Je Hora



Chuck Farrell
DANA Corp.
7254 Mt. Holly Rd.
Charlotte, NC 28214

1-12-95

704-399-3395

Dear Mr. Farrell:

As we had discussed last week, Spectrum-Nationwide Environmental, Inc.is available to assist you in spill and runoff control. Spectrum Environmental is also active in the following areas:

24 hr Spill Response

Tank Disposal

Soil Remediation and disposal Phase 1 Environmental Audits

Tank Removal: commercial and residential

Tank Pumping

Water and Soil Sampling Monitoring Well Installation

EOUIPMENT

Spill Response Truck:

250 gallon holding tank, 50 feet of hose, Viking Gear Pump, oil

dry material, Fiber Perl, containment booms, storage barrels,

shovels, brooms etc.

Spill Response Truck:

550 gallon holding tank, 50 feet hose, Viking 2-L gear pump 75

gpm with above listed equipment.

Pumper Truck:

1500 gallon tank, Viking 2-L gear pump 75 gpm, 50 feet hose

Pick Up Truck:

Hauls additional equipment required Case 580 Super E

Back Hoe:

8 Cubic Yards

Dump Truck: River Booms:

75 feet of containment booms

-Additional pumper trucks are available

-Soil sampling unit to take samples from depths of 3-15 feet

-PID Meter for Volatile Organic Compound (VOC) detection

PERSONNEL

Four full time employees and several part time employees as needed. All of our staff havehad the DOT HM-126 Hazmat Training course and have completed or are working on the OSHA Hazardous Waste Training program (29 CFR HAZWOPER).

RESPONSE TIME

In Mecklenburg County from time of notification is 45-60 minutes. Out side Mecklenburg is limited to drive time to the spill site

within a 75 mile radius of Charlotte.

NOTIFICATION

Office

704-334-2164 business hours 8:00 am-5:00 pm Fax 803-548-2084

Stephen Hamilton

Pager 704-346-5451, home 803-548-4734

Larry Boone

Pager 704-346-1742, home 704-542-3077

additional pager number additional pager number

704-346-6890 704-346-3636

SPILL PRICE STRUCTURE:

Disposal of liquids (oil, diesel, gasoline)

Spill truck with crew \$150/hr portal to portal (after 6:00 pm \$200/hr)

\$0.50/gal

Pumper Truck with driver \$125/hr portal to portal

Disposal Costs: Gasoline/Diesel Soil, incineration only, includes laboratory fee

 55 gallon drum of contaminated soil
 \$225/ drum

 1-4 tons
 \$225/ton

 5-10 tons
 \$200/ton

 11-15 tons
 \$175/ton

 16-20 tons
 \$150/ton

over 20 tons requires EPA 8260, 8270 with PCB,s \$1100 ea, this test is required for

incineration of truck load quantities in NC- one time only

20-30 tons \$110 30-50 tons \$95

Back hoe \$74/ hr

Mobilization of back hoe \$150- one time with in Mecklenburg County

Dump Truck \$57.00/hr

Laboratory Costs

TPH \$125 ea oil/grease \$100 ea PID meter \$75/ day

Spectrum's coverage area is within a 75 mile radius of the City of Charlotte.

Our EPA Number is NCD 986172435.

If we can assist you on projects in the area, please let us know.

Sincerely,

Stephen M. Hamilton

President SMH/jh



SPILL RESPONSE FMERGENCY PROCEDURES

To: Transportation/Drivers

Chemical/Gasoline

From: Offices of Safety and Environmental Affairs

Mr. Ronald Dana, President

Subject: Spill Response Emergency Procedures

In the event of an EMERGENCY/SPILL, perform the following procedures and collect the following information:

Α.

- 1. Contact the Site Manager, IMMEDIATELY!!!
- 2. Contact Dana Transport, Inc., and initiate Spill Notification:

DATE, TIME, DRIVERS NAME, TRACTOR NUMBER TRAILER NUMBER, SPILL LOCATION, TYPE OF SUBSTANCE, HAZARDOUS OR NON-HAZARDOUS, APPROXIMATE AMOUNT OF SPILL

3. Contact Mr. Ron Dana, President, Dana-Transport, Inc., via BEEPER (1-800-872-9544 code #0886) and Mr. Daniel J. Bononni, Director of Environmental Operations, Dana Transport, Inc., via BEEPER (1-800-872-9544 code #0888), and notify same of the quantity and nature of the spill.

BEEPER: Dial telephone number, then enter I.D. code, listen for triple beep then enter the number you want displayed and hang up.

- 4. After notification of Supervisors, and if so directed, continue the following procedures:
- 5. Contact the local police department
- 6. Determine the State Environmental Office via directory assistance, and contact and notify same.
- 7. Notify the National Response Center (NRC) at:

1(800) 424-8802 (or)

Chemtrec at:

1(800) 424-9300

You will be asked the following information:

- A. Your location and phone number
- B. Location of the accident
- C. Name of product and shipper, if known
- D. Weather conditions
- E. Type of environment (populated, rural, business, etc..)
- F. Availability of water supply

8. Collect the following information and paperwork:

Shipping Papers
MSDS

and FAX the above to Dana's Safety Department, Avenel, N.J. FAX: 1(908)750-1759

9. Incident/Spill Report must be completed immediately at the nearest terminal, and faxed or sent to the Safety Department.

B. HIGHWAY SPILL CONTINGENCY

- 1. Notify local authorities and State Environmental Office of spill
- 2. Contact Dana Transport, Inc., and initiate Spill procedure
- 3. Abate spill
- 4. As per 49 CFR 172 (G) Emergency response communication standard, utilize an Emergency Response Guidebook hereafter "ERG".

1. ERG UTILIZATION:

- a. Color codes: Yellow, orange, blue, green and white
- b. Yellow: Contains a sequential listing if hazardous materials by identification number. These numbers are assigned to specific hazardous materials in Section 172.101 of Hazardous Material Regulation. The same materials are listed in different order in ERG and HMR.
- c. Orange: Contains emergency response guides. Each page is numbered from 11-76. Furthermore, each guide is divided into two sections and each section are divided into subheadings: fire, explosion, health hazards, small or large spills and first aid.
- d. <u>Blue:</u> Contains an alphabetical version of hazardous materials listed in the yellow pages.
- e. <u>Green</u>: Contains a table of the Table of Initial Isolation and Protective Action Distances. This section is utilized to determine safe distances that should be established for hazardous materials.
- f. White: Contains protective actions, clothing, fire and spill controll actions and other information pertaining to reporting (last page).



This policy is to become effective as of: June 30,1992

Any inquiries regarding these spill procedures contact Mr. Daniel J. Bononni, Director of Environmental Operations, Dana Transport, Inc.

DANA TRANSPORT, INC.

RONALD DANA President

Safety Office

SPILL/INCIDENT REPORT

DRIVERS NAME:
DATE:
TIME:
TRACTOR NUMBER:
TRAILER NUMBER:
LOCATION OF SPILL:
· · · · · · · · · · · · · · · · · · ·
· · · · · · · · · · · · · · · · · · ·
AMOUNT OF SPILL/DAMAGE:
TYPE OF SUBSTANCE:
HAZARDOUS: NON-HAZARDOUS:
NAME(S) OF PERSON(S) OR COMPANY(S) INVOLVED:
NAME(S):
ADDRESS:
TELEPHONE:
WERE THE LOCAL AUTHORITIES PRESENT: YES NO
IF YES, NAME OR OFFICER(S) AND/OR PRECINCT:
WAS THE STATE ENVIRONMENTAL AGENCY CONTACTED:
YES: NO:
WHERE THERE ANY WITNESSES:
IF YES, NAME OF WITNESS(S):
TELEPHONE :

SPILL/INCIDENT REPORT (CONTINUED)		
EXPLANATION OF HOW SPILL OCCURRED:		
		·
		·
	•	
WHERE ANY PHOTO'S TAKEN: YES	NO	
WHERE THERE ANY INJURIES: YES	NO	
IF SO, EXPLAIN:	· · · · · · · · · · · · · · · · · · ·	
ADDED COMMENTS:		
		<u>. </u>
•		
SIGNATURE:		
DATE:		•
TERMINAL:	•	•
DEPARTMENT:		



Guy Thompson Area Manager Manufacturing/Industrial Marketing & Sales

4944 Parkway Plaza Blvd. · Suite 400 · Charlotte, North Carolina 28217 Phone 704-357-0892 Ext. 239 · Fax 704-357-0962



Steward W. Scher Director of Business Development

2300 SARDIS ROAD N. • SUITE Q • CHARLOTTE, NC 28227 PHONE (704) 845-2000 • FAX (704) 841-8901

P.03

Environmental and
Industrial Services, Inc.
D

STATEMENT OF QUALIFICATIONS

Mailing Address:
Post Office Box 484
High Point, NC 27261

Facility Address: 2718 Uwharrie Road Archdale, NC 27263

Telephone: (910) 434-7750 Facsimile: (910) 434-7752

January 1996



ACCREDITED LABORATORIES, INC.

Implementing Tomorrow's Technology, Today™...

November 15, 1996

Mr. Dan Bonanni Dana Transport 210 Essex Avenue Avenel, NJ 07007

Subject: CORPORATE SERVICE CONTRACT FOR 1996-1997

Dear Dan:

I would like to take this opportunity with pleasure to thank you for your continued support.

As per our discussion, this is to confirm extension of Accredited Laboratories, Inc's. field sampling and analytical services agreement with Dana Transport effective November 1, 1996 until officially informed of its term status by your office.

It is understood that services will be provided in a "call-in" basis with a standard turn-around-time for analytical data results of two (2) weeks faxed, and three (3) weeks for the hardcopy. Expedited turnaround-time of 24 hrs., 48 hrs., 72 hrs., and 5 working days can be provided with prior approval from the laboratory before sample receipt. All standard reporting format will be NJ Reduced Deliverables - or its equivalent if requested for other states - unless specified on the Chain-of Custody forms.

I have enclosed a fee schedule exclusively for DANA Transport that would address your routine analytical requirements. Please feel free to call me on pricing for special projects.

If you have any further questions or concerns, please do not hesitate to call me at (908)541-2025 or page me at 1(800)405-9245.

Sincerely

Accredited Laboratories, Inc.

Willie Urbiztondo

V.P. Sales and Marketing

ACCREDITED LABORATORIES, INC.

MAJOR ANALYTICAL PACKAGES

For: DANA TRANSPORT Effective: 11/15/96

Prepared by: Willie Urbiztondo

FEE SCHEDULE

. FEE SCHEDULE					
TESTING PARAMETERS Water/Soil-Reduced Deliverables					
· · · · · · · · · · · · · · · · · · ·		<u> </u>			
MAJOR ANALYTICAL	10 DAYS	5 DAYS	72 HRS	48 HRS	24 HRS
priority Pollutant	\$525	\$656	\$708	\$919	
PP+40	\$579	\$724	\$782	\$1013	<u> </u>
TCL/TAL	\$600	\$750	\$810	\$1050	<u>.</u>
TCL/TAL+30	\$625	\$782	\$844	\$1093	
PP Parameters		-	-		
VO (8240A/8260/624)	\$115	\$144	\$167	\$201	\$213
VO+LS(8240/624)	\$120	\$150	\$174	\$210	
BNA (8270/625)	\$220	\$275	\$319	\$385	\$407
BNA+25 (8270/625)	\$235	\$294	\$411	\$435	
BN (8270/625)	\$165	\$206	\$239	\$288	\$313
BN+15(8270/625)	\$170	\$212	\$246	`\$298	
Acid Ext. (8270/625)	\$112	\$123	\$157	\$196	\$207
Acid Extractables+10	\$122	\$140	\$171	\$214	
PP Metals (13)	\$99	\$124	\$143	\$173	
Pest/PCB'S(608/8080)	\$110	\$126_	\$154	\$192	\$203
PCB'S (608/8080)	\$ 65	\$75	\$88	\$114	\$115
PAH (625/8270)	\$145	\$168	\$195	\$254	
Pesticides	\$90	\$113	\$121	\$157	\$175
BTEX (602)	\$60	\$69	\$75	\$98	\$115
TPHC (418.1)	\$35	\$35	\$35	\$48_	\$50
TSS (160.2)	\$8	\$10	\$12	\$16	
рН	\$4	\$4	\$4	\$4	
TOC (single)	\$12	\$15	\$24	\$36	
TOX	\$56	\$64	\$78	\$98	\$102
Herbicides	\$125	\$143	\$175 ·	\$218	
VO Stars (8021)	\$85	\$98	\$119	\$145	\$157

Metals flame/element	\$8	\$10	\$12	\$13	\$20	
Metals ICP/element	\$8	\$10	\$12	\$13	\$20_	
Metals GFAA	\$16	\$20	\$24	\$30	\$35	
Prep.Charges/method	\$5	\$5	\$5	\$5	\$5	
TCLP Metals	\$120	\$160	\$173	\$202	\$232	
Total RCRA Metals	\$85	\$115	\$128	\$149	\$157	

.

ACCREDITED LABORATORIES, INC.

WASTE CLASSIFICATION PARAMETERS

DANA TRANSPORT

	SOIL/SOLIDS - REDUCED DEL.				
Waste Characterization	10 day	5 days	72hrs	48 hrs	
Full TCLP	\$591	\$710	\$886	\$1093	
Full TCLP w/o Pest/herb	\$525	\$656	\$735	\$971	
Metals (TCLP)	\$120	\$160	\$173	\$202	
Volatiles (TCLP)	\$145	\$174	\$210	\$270	
Semi-Volatiles (TCLP)	\$255	\$328	\$360	\$433	
Regular TCLP Extraction	\$40	\$40	\$40	\$40	
Zero Headspace Extraction	\$50	\$50	\$50	\$50	
Pesticides/Herbicides	\$144	\$165	\$239	\$252	
RCRA Characteristics	\$55	\$75	\$85	\$101	
Corrosivity pH	\$4	\$4	\$4	\$4	
Ignitability	\$14	\$18	\$22	\$25	
Reactive Cyanide	\$28	\$35	\$42	\$48	
Reactive Sulfide	\$28 .	\$35	\$42	\$48	
PCB'S	\$65	\$75	\$88	\$114	
TOX	\$56	\$70	\$84	\$96	
TPHC(418.1)	\$35	\$35	\$35	\$48	
GC FID Fingerprint (8015)	\$70	\$80	\$102	\$126	
TPHC DRO(8015)	\$70	\$80	\$102	\$126	
TPHC GRO(8015)	\$60	\$69	\$75	\$98	

CHEMICAL AND PHYSICAL PROPERTIES

		Standard Deliverables					
Testing Parameter	Methods	14 DAY	5 DAY	48 HR	24 HR		
Acidity 305.1		\$10	\$12	\$14	\$20		
Alkalinity	310.1	\$10	\$12	\$14	\$20		
% Ash D482		\$20	\$25	\$28	\$40		
Bicarbonate	SM 4500	\$10	\$12	\$14	\$16		
BOD (5 Day)	405.1	\$20	\$25	\$30	\$38		
Bromide	SM 500	\$16	\$20	\$24	\$32		
BTU/LB	ASTM D2362	\$40	\$50	/\$ 56:	\$76		
Carbon				C-17			
Total	415.1	\$16	\$20	\$24	\$32		
Inorganic	415.1	\$20	\$25	\$18	\$20		
Organic (TOC)	415.1/9080	\$12	\$15	\$36	\$24		
Carbonate	SM 4500	\$24	\$30	\$84	\$48		
Carbon Dioxide	SM 4500	\$60	\$75		\$120		
Cation Exchange Ratio	9080/1	\$10	\$12	\$14	\$20		
Chloride	325.3	\$8	\$10	\$14	\$20		
Chlorine, Total Residual	330.5	\$8	\$10	\$12	\$16		
Chlorine Demand	SM 2350B	\$32	\$40	\$44	\$60		
COD	410.4	\$16	\$20	\$24	\$32		
Color 110.2		\$8	\$10	\$12	\$16		
Conductivity, Specific	120.1/9050	\$8	\$10	\$12	\$16		
Corrosivity (pH)	150.1/9040	\$4	\$4 ·	\$4	\$4		
Corrosivity (LI)	EPA	\$16	\$20	\$24	\$32		
Cyanide		<u> </u>					
Reactivity	SW 846	\$ 28	\$ 35	\$42	\$48		
Total	335.2	\$28	\$35	\$42	\$56		
Amenable	335.1	\$44	\$55	\$66	\$88		
Flouride	340.2	\$10 _	\$12	\$14	\$20		
Hardness, Total	130.2	\$8	\$10	\$12	\$16		
Hydrocarbons, Petroleum (TPHC)	418.1	\$ 35	\$35	\$38	\$53		
Ignitability, Flash Point	1010	\$14	\$18	\$22	\$28		
Iodine SM 4500		\$12	\$15	\$18	\$24		
Nitrogen	<u> </u>			<u> </u>			
Ammonia	350.2	\$12	\$15	\$18	\$24		
Total Kjeldahl	.351.3	\$12	\$15	\$18	\$24		
Nitrate	SM 4500/352.1		\$15	\$18	\$24		
Nitrite	354.1	\$12	\$15	\$18	\$24		
Nitrate + Nitrite	353.3	\$12	\$15	\$18	\$24		
Organic Total	351.3	\$24	\$30	\$36	\$48		
Odor	140.1	\$16	\$20	· \$24	\$12		
Oil & Grease, Gravimetric	413.1/9070	\$30.	\$38	\$46	\$60		
Oil & Grease, IR	413.2	\$24	\$30	\$36	\$48		
Oxidation Potential	SM 2580	\$20	\$25	\$30	\$40		
Oxygen, Dissolved	350.1	\$8	\$14	\$12	\$16		

CHEMICAL AND PHYSICAL PROPERTIES

·		Reduced Deliverables						
Testing Parameter	Methods	10 DAYS	5 DAYS	48 HRS	24 HRS			
Paint Filter Test	9095	\$10	\$12	\$14	\$20			
Particle Size Analysis (Sieve)	ASTM D422	\$20	\$25	\$30	\$40			
Particle Size Hydrometer	ASTM D422	\$92	\$115	\$138	\$184			
Phenois, Total	420.1/9066	\$28	\$35	\$42	\$56			
Phosphorus								
Dissolved	365.3	\$10	\$12	\$14	\$20			
Ortho	365.3	\$10	\$12	\$14	\$20			
Total	365.3	\$10_	\$12	\$14	\$20			
pH	150.1	\$4	\$4	\$4	\$4			
Reactivity (S/CN)	SW 846	\$56_	\$70	\$84	\$112			
Salinity	SM 2520	\$16_	\$20	\$24	\$32			
Sílica, Dissolved	6010	\$12	\$15	\$18	\$24			
Solids								
Dissolved (TDS)	150.1	\$10_	\$12	\$14	\$20			
Percent	EPA-CLP	\$5	\$5	\$5	\$5			
Suspended (TSS)	160.2	\$8	\$10	\$12 .	\$16			
Total (TS)	160.3	\$8	\$10	\$12	\$16			
Total Volatile (TVS)	160.4	\$10_	\$12	\$14	\$20			
Specific Gravity	SM 2710	\$8	\$10	\$12	\$16			
Sulfate	'375.3/.4	\$8	\$10	\$12	\$16			
Sulfide, Reactive	SW 846	\$28_	\$35	\$42	\$56			
Sulfite	377.1	\$8	\$10	\$12	\$16			
Sulfur	ASTM D3177	\$24	\$30	\$36	\$48			
Surfactants (MBAS)	425.1	\$32	\$40	\$48	\$64			
Thiocyanate	SM 4500	\$36	\$45	\$54	\$72			
Total Organic Halogens (TOX)	9020	\$56	\$70	\$84	\$112			
Temperature	170.1	\$5	\$5	\$5	\$5			
Turbidity	180.1	\$8_	\$8	\$8	\$8			
Viscosity	ASTM	\$32	\$40	\$48	\$64			
% Water (Karl Fisher)	ASTM E-203	.\$44	\$55	\$66	\$88			

credited Laboratories Inc.

METALS ANALYSIS

Reduced Deliverables

RCRA HEAVY METALS (8) TCLP (As,Ba,Cd,Cr,Pb,Hg,Se,Ag)

PRIORITY POLLUTANT METALS (13) (As,Sb,Be,Cd,Cu,Ni,Pb,Hg,Se,Ag,Ti,Zn)

TAL METALS (23) (AI,Sb,As,Ba,Be,Cd,Ca,Cr,Co,Cu,Fe Pb,Mg,Mn,Hg,Ni,K,Se,Ag,Na,Ti,V,Zn)

	1		Fee Schedule (1)					
	1	Į.	10 D					
Testing Parameter	Standard	Optional.	Standard.	Optional	5 DAYS	48 HRS	24 HRS	
	Methods	Methods	Methods	Methods		ndard Meth		
Aluminium (Al)	200.7/6010	202.1/7020	\$8	\$16	\$10	\$12	\$16	
Antimony (Sb)	200.7/6010	204.1/7040	\$8	\$16	\$10	\$12	\$16	
Arsenic (As)	206.2/7060		\$16		\$20	\$24	\$32	
Barium (Ba)	200.7/6010	208.1/7080	\$8	\$16	\$10	\$12	\$20	
Beryllium (Be)	200.7/6010	210.1/7080	\$8	\$16	\$10	\$12	\$20	
Boron (B)	200.7/6010		\$8		\$10	\$12	\$20	
Cadmium (Cd)	200.7/6010	213.1/7130	\$8,	_ \$16	\$10	\$12	\$20	
Calcium (Ca)	200.7/6010	215.1/7140	\$8	\$16	\$10	\$12	\$20	
Chromium, Total (Cr)	200.7/6010	218.2/7190	\$8	\$16	\$10	\$12	\$20	
Chromium, Hexavalent (Cr+6)	200.7/7196		\$22/75		\$22/75	\$ 26/90	'\$44/150	
Cobalt (Co)	200.7/6010	219.1/7200	\$8	\$16	\$10	\$12	\$20	
Copper (Cu)	200.7/6010	2201/7210	\$8	\$16	\$10	\$12	\$20	
Gold (Au)	200.7/7420		\$24		\$30	\$36	\$60	
Iron (Fe)	200.7/6010	236.1/7380	\$8	\$16	\$10	\$12	\$20	
Lead (Pb)	200.7/7421	200.7/6010		\$8	\$20	\$24	\$40	
Lithium (Li)	SM 3500	7430	\$8	\$16	\$10	\$12	\$20	
Magnesium (Mg)	200.7/6010	242.1/7450	\$B	\$16	\$10	\$12	\$20	
Manganese (Mn)	200.7/6010	243.1/7460	\$8	\$16	\$10	\$12	\$20	
Mercury (Hg)	245.1/7470		\$22/28		\$26/34	\$30/40	'\$44/56	
Molybdenum (Mo)	200.7	243,1/7480	\$8	\$16	\$10	\$12	\$20	
Nickel (Ni)	200.7/6010	249.2	2 \$8	\$16	\$10	\$12	\$20	
Platinum (Pt)	200.7/6010	255.	1 \$8	\$16	\$10	\$12	\$20	
Pottasium (K)	200.7/7740	258.1/7610	\$8	\$16	\$10	\$12	\$20	
Selenium (Se)	200.7/6010		\$16	1	\$20	\$24	\$40	
Silicon (Si)	200.7/6010		\$8		\$10	\$12	\$20	
Silver (Ag)	200.7/6010	272.1/776	516		\$20	\$24	\$40	
Sodium (Na)	200.7/6010	273.1/777	0 \$8	\$16	\$10	\$12	\$20	
Strontium (Sr)	200,7/6010	778	0 \$8	\$16 -	\$10	\$12	\$20	
Thallium (Ti)	279.2/7841	200.7/601	0 \$16	\$8	\$20	\$24	\$40	
Tin (Sn)	200.7/6010	282.1/787	0 \$8	\$16	\$10	\$12	\$20	
Titanium (Ti)	200.7	283.	1 \$8	\$16	\$10	\$12	\$20	
Vanadium (V)	200.7/6010	286.1/791	0 \$8	\$16	\$10	\$12	\$20	
Zinc (Zn)	200.7/6010	289.1/795	0 \$8	\$16	. \$10	\$12	\$20	

Accredited Laboratories Inc.

MICROBIOLOGICAL ANALYSIS

<u> </u>	L	Fee Schedule								
· · · · · · · · · · · · · · · · · · ·		5 D/	AYS	10 D	AYS					
Testing Parameter	Method	Water	Soll	Water	Soil					
MICROBIOLOGY										
Bioassay (Microtox TM)	N/A	\$18	\$18	\$14	\$14					
Collform, Fecal (MF/MPN)	SM 9222D	\$18	\$18	\$14	\$14					
Collform, Total (MPN)	SM 9221 B	\$30	\$50	\$24	\$40					
E. Coli	SM 9225	\$25	\$50	\$20	\$40					
Enterococous(MPN) (MF)	SM 9230 B/C	\$150	\$75	\$120 _	\$140					
Giardia		\$30	\$50_	\$34	\$40					
Iron Bacteria	SM 9240	\$150	\$175	\$120	\$140					
Pseudomonas	SM 9213 E	\$30	\$50	\$24	\$40					
Streptococci, Fecal	SM 9230 B	\$25	\$50	\$20	\$40					
Salmonella (MPN)	SM 9260	\$35	\$55	\$28	\$44					
Standard Plate Count / Heterotrophic	SM 9215 B	\$20	\$45	\$16	\$36					
Water Suitability	SM 9020	\$125		\$100						



CHAIN OF CUSTODY RECORD

PAGE OF GROTE S

449 Springbrook Road . Charlotte, NC 28217 P.O. Box 240543 A Charlotte, NC 28224-0543 Phone: 704/529-6364 A Pax: 704/525-0409

Phone 79-755 Fac. Project Name Project Name			_	PRESS DOWN FIRMLY - & COPIES PREFORT TO: State				State Certification Requested NC SC Other NA Water Chloricated Yes No NA Sample load Upon Collection Yes No No								
CLIENT	DATE	COLUBCIED	MATRIX SOL,		ECOM	AMEN	PRESERVA- TIVES			/	PES PIECI	JESTHO		PREMARKOS	SUB US CERC	PHEN
SAMPLE DESCRIPTION	COLLECTED	MILITARY HOURS	WATER OR SLUDGE	TYPE SEE BELOW	NO.	SEZE	INFZ	1	*/	1		//	1.	/ Amount	ID NO.	10 NO.
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DRINKING WATER: NC

*CONTAINER TYPE CODEs: A = Amber C = Clear G = Glass P = Plastic; TL = Tefon-Lined Cap VOA = Volatile Organics Analysis (Zero Head Space)





WASTE APPROVAL FORM

Date

07-22-99

BFI Location BFI initiator

Charlotte Landfill

Generator

Linda Daniel
Mast Brothers

Generator Location WCD Number

Charlotte, NC

WCD Number

NP30773

BFI Number

000201BR

WASTE DESCRIPTION:

Contaminated Soil

SAPETY PRECAUTIONS: Avoid Skin and Eye Contect,

RECOMMENDED MANAGEMENT:

Bioremediation

Facility...

Charlotte Landfill

COMMENTS:

The following items were reviewed by the Corporate Waste Approval Group:

- WCD dated 07/21/99

2. Analysis from Prism Laboratories

The above is a recommendation of \$7%, it must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's person and injectional facility and lead togethers. The waste is based upon a system of the infermation provides by the generator and in confingent upon the receipt of the treatment undfor disposal facility of a weste material according equivalent in chemical composition and physical properties in their as defined above.

This waste stream has been assigned BFI Waste Code:

NC231/990722/000201BR

John Marston

Technical Representative

RECEIVED DATE: 07/27 17:02 99 FROM :7047822177

END



Phone: (803) 734-5200

PI	lease print or type. (Form designed for us	ise on elite (12-pitch) typewrit	ter.)						Form A	Approved O	MB No. 2	2050-0039. Expires 9-30-96
4	UNIFORM HAZARDOUS	1. Generator's US EPA ID			MANIFEST DO			2. Pag	· .			ne shaded areas is Federal law, but is
١	WASTE MANIFEST	NCDO 4 8			162	10	12-	<u> </u>		by State lav	v	
l	3. Generator's Name and Mailing Address							A. Sta	te Manife	st Documer		
١	DAMA CONTAINER 7254 MT HOLY FD	•						R Ste	ite Genera	ator's ID		
ĺ	CHARLOTTE	ଷଠ 2 ର 'ଜଣ-ଅନ୍ତ2	3214						100			
ļ	5. Transporter 1 Company Name	6.		US EPA ID I	lumber					orter's ID	<u>학교 (1984)</u> 동대왕 구구장	
١	T.B. MANT SPECIAL-	Commontes I	1/2/2	1811	200	5 5	1/			s Phone //		3 (8-8537)
Ì	7. Transporter 2 Company Name	8.	1 1 1	US EPA ID I	lumber	1	1		insporter'		aeta Nicolata abb igas abba	
l	Designated Facility Name and Site Address	000030 to		US EPA ID I	limber	L_		G. Sta	ite Facility			
	SAFETY-KLEEN CORF	•	•	USEFAIDI	umber							
l	130-A FRONTAGE RO LEXINGTON,	MD \$0 29073						H. Fa	clity's Ph	one	d America	Bal Sing (Q)
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ļ	11. US DOT Description (Including Proper Shipping	a Name Hazard Class, and ID No.	mber)			12.	Cont	ainers	T-1-1	13. Quantity	14. Unit •	Harkis .
l	a.						No.	Туре	Total	Country	Wt/Vol	Waste No.
1	RO NASTE COMBU	STIBLE LIQUI	D, H.	o.s.						720	1	D Q O 8
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	J. Additional Descriptions for Materials Listed Abo					Ц	_ـــ		ليل		لبا	
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	15. Special Handling Instructions and Additional Inf	formation d.			<u> </u>	بلم	15	9:	9915	05 0 -	000	-51-1006
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			SEPOTS		3851		•	• • • • • • • • • • • • • • • • • •	C:		D	
	16. GENERATOR'S CERTIFICATION: I hereb	by declare that the contents of				·-·	ad abor	e by pro		or name sn		
	and labeled, and are in all respects in prop	per condition for transport by hi	ghway accordii	ng to applicable	International a	ind nat	ional go	vernmen	t regulation	ns and the la	ws of the	State of South Carolina.
	If I am a large quantity generator, I certil be economically practicable and that I present and future threat to human hea	have selected the practicable	le method of t	reatment, stor	age, or dispo	sal cui	rentiv	available	to me w	hich minimi	zes the	<u> </u>
	generation and select the best waste ma	anagement method that is a	vailable to me	and that I can	afford.	ve ma		ood laitil	enon to		waste	Date
,	01 1 - 11			Signature .	202	2.	1				I	Month Day Year
_ r	17. Transporter 1 Acknowledgement of Receipt of	of Materials		\$1.35 x x	71.71 <u>5**</u>	<u> </u>	14.20 11.50	1.4%. 38m 13				Date
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֝֟֝֟֝֟֝֟֝ ֚	18. Transporter 2 Acknowledgement or Receipt of	of Materials		0'								Date
E	Printed/Typed Name	•	1	Signature .				٠.			ı	Month Day Year
1	19. Discrepancy Indication Space					1						└──── ┼─┤
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٠	20. FACILITY Owner or Operator: Certification of re	scelpt of hazardous materials cove	red by this mani	fest except as no	led in Item 19.							
	Printed/Typed Name			Signature		•			· · · · · ·			Month Day Year
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2600 Bull Street, Columbia, SC 29201 Phone: (803) 734-5200

· `	ease print or type. (Form designed for use on elite (12-pitch) typewriter.)	•		Fo	m Approved O	MB No. 2050-0039. Expires 9-30-90
A	UNIFORM HAZARDOUS 1. Generator's US EPA ID No.	1	MANIFEST DOCUMENT NO.	2. Page 1		n in the shaded areas is red by Federal law, but is
$\ $	3. Generator's Name and Malling Address	<u> </u>	612/10/3		by State la	w
$\ $	DAHA CONTAINER			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
	7254 MT HOLY RD NC 28214			B. State Ge	rerator's ID	
	4. Generator's Phone (800) 796 - 3262 5. Transporter 1 Company Name 6.3	US EPA ID Numb	per	C. State Tra		i de la composition de la composition Composition de la composition de la co
	7. Transporter 2 Company Name	10818	1655			1-80364 8557
	7. Transporter 2 Company Name	US EPA ID Numi	per	F. Transpor G. State Fac	er's Phone	
	9. Designated Facility Name and Site Address ONATO SO 10.	US EPA ID Numb	oer .			
	130-A FRONTAGE ROAD LEXINGTON, SC 29073			H. Facility's		
		7 7 7 9	9 5 4 8 8		803 3	56-4061
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Cont No.	ainers T	13. otal Quantity	Unit Wt/Vol. Waste No.
	RO WASTE FLAMMABLE LIQUIDS, N. (ALPHA-METHYLSTRYBENE)	0.8.			920	每 D O O 1
	3 UN1993 PG TII (DOO!)(DRG#27)		1906	DIA		\tilde{o}^{P}
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	J. Additional Descriptions for Materials Listed Above.			K.	Handling codes	for wastes Listed Above
	· PK / DIDIZE OF BILL - [] [The second secon
	b. d. 15. Special Handling Instructions and Additional Information			9199	(507 O	-000-64-1606
	EMERGENCY RESP# (800)468 -1760 SK CORP AUTHORIZED TO BETAIN LICE	IF UNE INSED SUBS	ELIVERABL	D RETU	am to	GENERATOR.
	SKDC	T# A: C	648 B:	C	:	D:
	 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consi and labeled, and are in all respects in proper condition for transport by highway acc 	cording to applicable inte	rnational and national g	overnment regul	ations and the l	aws of the State of South Carolina.
	If I am a large quantity generator, I certify that I have a program in place to red be economically practicable and that I have selected the practicable method present and future threat to human health and the environment; OR, If I am	l of treatment, storage a small quantity gener	, or disposal currently rator, I have made a g	available to m	e which minim	nizes the
	generation and select the best waste management method that is available to Printed/Typed Name	Signature	ord/			Month Day Year
*	Robert F. Hayres	Robert	X 7 7/10	ento-		1016/214/916
RA	17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name	Signature		· //	17	Date Month Day Year
A N S P	DONALD AND MILL	Market in a	in the same of the	7846		752186
PORT	18. Transporter 2 Acknowledgement or Receipt of Materials Printed/Typed Name	Signature				Date Month Day Year
EЕ				_		
	19. Discrepancy Indication Space		a	1 1_1	itos. c.	lbs.
FA			b. 1 1	1 1 1	lbs. d.]
C			-		· ·	· · · · · · · · · · · · · · · · · · ·
l	20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this		in Item 19.			
Y	PrintedITyped Name	Signature	S	72	>	Month Day Year

81363-R4784 ENVIROSYSTEMS DANA CONTAINER

PREOUALIFICATION EVALUATION MANIFEST INFORMATION

REVISED: 06/19/96 RUN: 06/20/96

CONTROL #: SAMPLE #: 1610876-9 1048617

REQUIRED MANIFEST FORM: SC

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

	RATORS US EPA NO.	DOCUMENT	NO.	2.PAGE	UNDERLINED AREAS
WASTE MANIFEST	100040401370		ŀ	•	ARE REQUIRED
3. GENERATOR NAME AND MAI	LING ADDRESS	A	. STA	TE MAN	FEST DOCUMENT NO
DANA CONTAINER 7254 MT HOLY RD					
CHARLOTTE	NC 28214	B	. STA	TE GENI	ERATOR ID
4. GENERATOR PHONE 800	796 3262				
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202			ANS ID PORTER	PHONE
7. TRANSPORTER 2 CO NAME	8. US EPA ID NO			ANS ID PORTER	
9. FACILITY NAME AND SITE SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29	SCI	007799548			FACILITY STATE ID FACILITY PHONE 803 356 4061
11. US DOT DESCRIPTION				CONTAIL	NER I. WASTE NO
A. HM. RQ WASTE FLAMMABLE LIG (ETHANOL) 3 UN1993 PG II (D001)	•				<u>D001</u> N/H
J. ADDITIONAL DESCRIPTION	FOR THE MATERIALS	S LISTED	ABOVE		K. HANDLING CODES

15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

EMERGENCY RESP#708-888-4660(24 HR). IF UNDELIVERABLE, RETURN TO GENERATOR.

'- 81363-R4784

SAFETY-KLEEN CORP. NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

PAGE 1 OF 1

TO: SAFETY-KLEEN CORP.

130-A FRONTAGE ROAD LEXINGTON, SC 29073

EPA ID: SCD077995488

UNDER MANIFEST NUMBER

THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.

IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

HAZARDOUS WASTE CODES: D001

TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE DESCRIPTION AND
WASTE TREATMENT/REGULATORY SUBCATEGORY OR
CODE REGULATED HAZARDOUS CONSTITUENT

TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE

D001 HIGH TOC IGNITABLE CHARACTERISTIC WASTE.

RORGS; OR CMBST **

NOTES: *	THESE TREATMENT	STANDARDS DO N	OT PRECLUDE	SOLVENT R	RECOVERY OR
	USE AS FUEL PRI	OR TO LAND DISP	POSAL.		

- ** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
- *** TREATMENT STANDARDS APPLICABLE IN CERTAIN HWSA-AUTHORIZED STATES.
- ****AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

GENERATOR NAME: DANA CONTAINER	EPA ID: NCD048461370
GENERATOR SIGNATURE (OPTIONAL):	
NAME & TITLE (OPTIONAL):	·
SAFETY-KIEEN SAMDLE NUMBER. 1048617	CONTROL NUMBER 1610076-0



Bureau of Solid & Hazardous Waste Mgt. 2600 Bull Street, Columbia, SC 29201 Phone: (803) 734-5200 Emergency & Holidays: (803) 253-6488

P	ease print or type. (Form designed for use on elite (12-pitch) typewrit	ter,)			Form Approved O	MB No. 2050-0039. Expires	9-30-96
<u> </u>	UNIFORM HAZARDOUS WASTE MANIFEST 1. Generator's US EPA ID N C D G 4 8	No. MANIFEST DOG		2. Page of	1 Information	in the shaded area	s is
	3. Generator's Name and Mailing Address DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28 4. Generator's Phone (800, 736 - 326.2)	1214			e Manifest Documer		
	5. Transporter 1 Company Name 6. 7. Transporter 2 Company Name 8.	US EPA ID Number US EPA ID Number US EPA ID Number		D. Tran E. State F. Tran	e Transporter's ID sporter's Phone A e Transporter's ID sporter's Phone e Facility's ID	40344 - 83 :	35
	9. Designated Facility Name and Site Address COOK 30 10. SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073	·	4 8 E		lity's Phone	56-40 61	
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Nu		12. Conta	iners Type	13. Total Quantity	14. Unit Wt/Vol Waste No.	
	RO WASTE FLAMMABLE LIQUIDS (ETHANOL) 3 UN1993 PG II (DOOL)(ERG#27)	•	993	DM	1/3,75	p D 0 0	1
= .	b.		11				
A T			11		111		
R	d.		1 1		1111		
	J. Additional Descriptions for Materials Listed Above.				K. Handling codes f	or wastes Listed Above	
	b. Special Handling Instructions and Additional Information EMERGENCY RESP# (800) 468 - 176	o IF UNDELIV	r RLO	S PE	TURN TO	000-61-160 ENERATOR.	5
	SK CORP AUTHORIZED TO RETAIN	SKDOT# A: 2015		(M.LE)	c: na nac C:	D:	
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of and labeled, and are in all respects in proper condition for transport by hill I am a large quantity generator, I certify that I have a program in p be economically practicable and that I have selected the practicable present and future threat to human health and the environment; of	lace to reduce the volume and toxicity of wa le method of treatment, storage, or dispos R, if I am a small quantity generator, I hav	aste generate	d to the d	enree I have detern	nined to zes the y waste	arked, rolina.
•	generation and select the best waste management method that is a Printed/Typed Name	vailable to me and that I can afford. Signature	2 24 2	2.78,3		Month Day	Year G
	17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name 18. Transporter 2 Acknowledgement or Receipt of Materials	Signature	german John	Me	The state of the s	Month Day	Year
	Printed/Typed Name 19. Discrepancy Indication Space	Signature		-	·		Year
	The second secon	aí b.			lbs. c.	lbs.	
 -	20. FACILITY Owner or Operator: Certification of receipt of hazardous materials cover	ered by this manifest except as noted in Item 19.			· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	_
; 	Printed/Typed Name	Signature				Month Day	Year

E1262-R4784 ENVIROSYSTEMS DANA CONTAINER

PREQUALIFICATION EVALUATION MANIFEST INFORMATION

REVISED: 06/19/96 RUN: 06/20/96

CONTROL #: SAMPLE #:

1610863-2 1048615

REQUIRED MANIFEST FORM: SC

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

UNIFORM HAZARDOUS WASTE MANIFEST	ERATORS US EPA NO. NCD048461370	DOCUMEN	IT NO.	2.PAGE 1	UNDERLINED AREAS ARE REQUIRED
3. GENERATOR NAME AND MA DANA CONTAINER 7254 MT HOLY RD	ILING ADDRESS		A. STA	ATE MAN	IFEST DOCUMENT NO
CHARLOTTE 4. GENERATOR PHONE 800	NC 28214 796 3262		B. STA	ATE GENI	ERATOR ID
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202			RANS ID SPORTER	PHONE
7. TRANSPORTER 2 CO NAME	8. US EPA ID NO			RANS ID SPORTER	
9. FACILITY NAME AND SIT SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC		EPA ID N			FACILITY STATE 1D FACILITY PHONE 803 356 4061
11. US DOT DESCRIPTION				CONTAIL	NER I. WASTE NO
A. HM. RQ WASTE COMBUSTIBLE (ETHANOL) NA1993 PG III (D008)	-				D008 N/H
J. ADDITIONAL DESCRIPTIO	N FOR THE MATERIAL	S LISTEI	ABOVE	E I	K. HANDLING CODES

15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

EMERGENCY RESP#708-888-4660(24 HR). IF UNDELIVERABLE, RETURN TO GENERATOR.

81363-R4784

D008

SAFETY-KLEEN CORP. NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

PAGE 1 OF

TO: SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD

LEXINGTON, SC 29073

EPA ID: SCD077995488

UNDER MANIFEST NUMBER LINE NUMBER THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS. IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

HAZARDOUS WASTE CODES: D008

LEAD (PB)

TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY OR WASTE CODE REGULATED HAZARDOUS CONSTITUENT

TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE

5.0. MG/L EP OR TCLP

- NOTES: * THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR USE AS FUEL PRIOR TO LAND DISPOSAL.
 - NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
 - *** TREATMENT STANDARDS APPLICABLE IN CERTAIN HWSA-AUTHORIZED STATES.
 - ****AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

GENERATOR NAME: DANA CONTAINER	EPA ID: NCD048461370
GENERATOR SIGNATURE (OPTIONAL):	· · · · · · · · · · · · · · · · · · ·
NAME & TITLE (OPTIONAL):	

SAFETY-KLEEN SAMPLE NUMBER: 1048615

CONTROL NUMBER:

1610863-2

81363-R4784 ENVIROSYSTEMS DANA CONTAINER

PREQUALIFICATION EVALUATION MANIFEST INFORMATION

REVISED: 06/19/96 RUN: 06/20/96

CONTROL #:

1610863-2

SAMPLE #:

1048615

REQUIRED MANIFEST FORM: SC

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

	RATORS US EPA NO. NCD048461370	DOCUMENT NO.		DERLINED AREAS ARE REQUIRED
3. GENERATOR NAME AND MAI	LING ADDRESS	A. STA	TE MANIFE	ST DOCUMENT NO
DANA CONTAINER 7254 MT HOLY RD				
CHARLOTTE	NC 28214	B. STA	ATE GENERA	TOR ID
4. GENERATOR PHONE 800	796 3262			
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TE	RANS ID SPORTER PH	ONE
7. TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TE	RANS ID SPORTER PH	ONE
9. FACILITY NAME AND SITE	ADDRESS 10. US E	PA ID NUMBER	G. FAC	ILITY STATE ID
SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 2		0077995488		ILITY PHONE 03 356 4061
11. US DOT DESCRIPTION			CONTAINER	I. WASTE NO
A. HM. RQ WASTE COMBUSTIBLE (ETHANOL) NA1993 PG III (D008)(D008 N/H
J. ADDITIONAL DESCRIPTION	FOR THE MATERIALS	LISTED ABOVE	K.	HANDLING CODES
	·			:

15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

EMERGENCY RESP#708-888-4660(24 HR). IF UNDELIVERABLE, RETURN TO GENERATOR.



_	0-000-64 NE				Form Approved ON	B No. 2050-0030	Evnime 0.30.08			
P	UNIFORM HAZARDOUS 1. Generator's US EPA ID No.	MANIFEST DO	CUMENT NO.	2. Page 1		in the shad				
T	WASTE MANIFEST N C D O 4 5 4 6	사이건 열심	105	of]	by State law	d by Federal				
	3. Generator's Name and Mailing Address				fanifest Documen					
	DANA CONTAINER 7254 MT HOLY RD				Generator's ID	rains arises	\$200 () () () () () () () () () (
	CHARLOTTE MC 28214			D. Clair			Yang et al			
	5. Transporter 1 Company Name 6.	US EPA ID Number	<u> </u>	C. State T	ransporter's ID					
	T. Transporter 2 Company Name 8		5 5 /		ransporter's ID	<u>800768</u>	C-855 59			
	7. Transporter 2 Company Name 8.	US EPA ID Number	1.1	F. Transp G. State F	orter's Phone	The second secon				
$\ \ $	9. Designated Facility Name and Site Address 0000 30 10. SAFETY-KLEEN CORP.	US EPA ID Number		"大学"的大概的第三人称		alas de Sons Logistatoria de	### 30:50 0 3 1			
	130-A FRONTAGE ROAD		;	H. Facility	's Phone	in a second	Service of			
П	LEXINGTON, SC 29073	017171919151	4 6 8		803 35	6-4061	380.50 10 50 10000 1			
1			حلل	ulners	40	14.				
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		No.	Туре	13. Total Quantity	Unit Wt/Vol	Waste No.			
	RO WASTE FLAMMABLE LIQUIDS, H. C), S,		.	13 75	FIG	0 0 5			
	PO WASTE FLAMMABLE LIQUIDS, H.C (TOLUENE@ISOPROPYL ACETATE) 3 UN1993 PG II(F005)(ERG#27)		003	MG.	1-14-4-4	p D	0 0 1			
G	b.		 							
E				,			<u> </u>			
E.	c.									
A			1							
T										
R	d.									
			1							
1	J. Additional Descriptions for Materials Listed Above.				K. Handling codes fo	r wastes Listed Ab	OV9 evo			
		i i i i								
	· SIK 110101611 01012H	1					Alle At			
	15. Special Handling Instructions and Additional Information EMERGENCY RESP# (800)468 -1760	17 UNDELIV	- 1	919	1512 0-	000-64	-1606			
۱	SK CORP AUTHORIZED TO RETAIN LICER	SED SUBSEQUE	nt cyl	E RETE	IRN TO G S AS NEC					
1	Company of the property of the SMDO7	『# A: 2062	B:	(C :	D:				
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consign	ment are fully and accurately d	escribed above	e by proper	shipping name and	are classified, p	backed, marked,			
\prod_{i}	and labeled, and are in all respects in proper condition for transport by highway according to a large quantity generator. I certify that I have a program in place to reduce						South Carolina.			
H	If I am a large quantity generator, I certify that I have a program in place to reduce be economically practicable and that I have selected the practicable method of present and future threat to human health and the environment; OR, if I am a second to the program of the prog	f treatment, storage, or dispos small quantity generator, I have	sal currently ve made a g	available to ood faith effo	me which minimizert to minimize my	es the waste	2 2 3 3 3 3 3			
	generation and select the best waste management method that is available to m Printed/Typed Name	Signature				Month	Date Day Year			
\	Robert F. Hayes	Robsen 2	Freeze	Hotala		015	241916			
TR	17. Transporter 1 Acknowledgement of Receipt of Materials		<u>('</u>				Date			
AN	Printed/Typed Name ANALA ANALA	Signature /	1/1/2	The said	Z ^{rek} Sanggan e salah	Month ایک هرا	Day Year			
RANSPORTER	18. Transporter 2 Acknowledgement or Receipt of Materials	1 My services	40 C	a person-		12/2/	Date			
R	Printed/Typed Name	Signature				Month	Day Year			
R		<u> </u>					لللت			
_	19. Discrepancy Indication Space	8			lbs. c. 1	. L L I _ I	lbs.			
F			1							
C			· LL_		lbs. d. []		ibs.			
L	20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this ma	anifest except as noted in Item 19.								
Ť,	Printed Typed Name	Signature		Teres of time	· · · · · · · · · · · · · · · · · · ·					
. Y '	15111012 (NATE TO)	January State Stat	أبيسيسين		7	Month (SIA)				

DANA CONTAINER (CHARLOTTE, N.C.)

HAZ DRUMS	NON-HAZ
7 D. PHENOL - DIRT "1	D CATEX - FATTY ACID!
	2) TEA - GLYCOL 2
V 3) WHITE INK 3	3) FATTY ALCOHOL 3
4) WASTE WATER 4	(4) LUROL PS 6096 4
5) EMOCIC ACID 5	First S) LLIROL PS 6096 4
2 6) DIESEL FUEL-SODIUM D	0 1.
17) RED INK - ACETONE 8 3	
8) PHENOL - DIRT 1	8) Lurol 957 4
9) WASTE WATER & 4	9) WAX EMULSION 5
10) WASTE WATER \$ 4	10) LATEX 61
- 11) PHENOL	11) CUROL 48M 4
? 12) PHENOL 61	12) LURUL PS 6096 4
	13) WIROL 481M 4
V 14) ETHER 66	14) UTTEX 61
(CAS 66297) 15%)	15) LATEX 61
	16) LATEX 61
	17) TAR 06
Andrease appears and the second of the secon	18) LATEX-FATTY ACIDI
	19) WAX EMULSION 5
Section of the sectio	20) LUAX EMUCSION 5
Same and was a same of the same and the same	21) SOAP STOCK \$7
The same of the second	22) LATEX

The charge process of the control of	23) LIROL #126 4 24) PP3728, PO520
Meson resources and a second s	341 PP3728, POS20 > 2 LURGEN 48M. LUROL-RO109.4
en e	25) R3006, R0624 26) P00'760, P5 6048, LUROL 64894 26) 4511
The second secon	26) 451/

81363-R4784 ENVIROSYSTEMS DANA CONTAINER

PREQUALIFICATION EVALUATION MANIFEST INFORMATION

REVISED: 06/20/96 RUN: 06/21/96

CONTROL #: SAMPLE #: 1610870-6 1048618

REQUIRED MANIFEST FORM:

SC

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

		:	4							
	FORM HAZARDOUS		RATORS US NCD048461		DOCUME	ENT NO.	2.PAGE 1	UNDE	RLINED RE REQU	
3.	GENERATOR NAME	AND MAI	LING ADDR	ESS	*	A. STA	TE MAN	FEST	DOCUME	ON TH
	DANA CONTAINER 7254 MT HOLY RI	o								
	CHARLOTTE		NC	28214		B. STA	ATE GENI	ERATO	RID	
4.	GENERATOR PHONE	E 800	796 3262	•						
_	TRANSPORTER 1 (SAFETY-KLEEN CO		6. US EP	A ID NO 4908202		C. ST TI D. TRANS			E	
7.	TRANSPORTER 2 (O NAME	8. US EP	A ID NO		E. ST TI			E	
9.	FACILITY NAME A	ND SITE	ADDRESS	10. US	EPA ID	NUMBER	G. I	FACIL	ITY STA	TE ID
	SAFETY-KLEEN CO 130-A FRONTAGE LEXINGTON,	-	9073	SC	D077995	5488	H. 1		ITY PHO 356 40	
11.	US DOT DESCRIE	PTION					CONTAI	NER I	. WASTE	NO
A. HM.	RQ WASTE FLAMM (ALPHA-METHYLS 3 UN1993 PG I	STRYRENE							D001	N/H
J.	ADDITIONAL DESC	CRIPTION	FOR THE	MATERIAL	S LISTE	ED ABOVE	3 1	K. HA	NDLING	CODES
1 5	CDECTAL HANDE	INC INCO	DITCUTONE	AND ADDI	TIONAL	TMEODM	AMITON			

SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

EMERGENCY RESP#708-888-4660(24 HR). IF UNDELIVERABLE, RETURN TO GENERATOR.

81363-R4784

SAFETY-KLEEN CORP.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073 EPA ID: SCD077995488

PAGE 1 OF

UNDER MANIFEST NUMBER

THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.

IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

HAZARDOUS WASTE CODES: D001

TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE DESCRIPTION AND TREATMENT STANDARD
WASTE TREATMENT/REGULATORY SUBCATEGORY OR CONCENTRATION OR
CODE REGULATED HAZARDOUS CONSTITUENT TECHNOLOGY CODE

D001 HIGH TOC IGNITABLE CHARACTERISTIC WASTE. RORGS; OR CMBST **

- NOTES: * THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR USE AS FUEL PRIOR TO LAND DISPOSAL.
 - ** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
 - *** TREATMENT STANDARDS APPLICABLE IN CERTAIN HWSA-AUTHORIZED STATES.
 - ****AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

GENERATOR NAME: DANA CONTAINER	EPA ID: NCD048461370
GENERATOR SIGNATURE (OPTIONAL):	· · · · · · · · · · · · · · · · · · ·
NAME & TITLE (OPTIONAL):	
SAFETY-KLEEN SAMPLE NUMBER 1048618	CONTROL NUMBER 1610970-6

神経を放映してきる

T	LINIE	ORM HAZARDOUS	on elite (12-pitch) typewriter.) 1. Generator's US EPA ID I	No.	Manifest Docu	ment No.		Info	mation in	0-0039 Expires 9- the shaded areas
11		ASTE MANIFEST	NCDOTYSOS	850	91196	•				by Federal law.
3	. Gene	rator's Name and Mailing Addre	ess					te Manifest Doo	ument Nu	mber
Π	Dan	a Container Corp	o.							
\prod	725°	4 M1. Holy Rel. arlotte, NC 282 rator's Phone (704)	.14				B. St	ate Generator's	ID	
			146 399-3395				-			610 11
5.	. Transi Haz	porter 1 Company Name	montal Good	6. US E	PA ID Number ワフとタGル	27	L	ate Transporter		51F NY
17	Trans	porter 2 Company Name	MENTAL GROUP	8. US E	PA ID Number		E. St	ate Transporter	s ID	- W- /
		nated Facility Name and Site A	BUK Cariers		PA ID Number			ansporter's Pho ate Facility's ID	ne XV	0-558-66
}	Waste	c. Technologies In	idustries	OHD98						
		Saint George St		CHUIO	70133 <i>[</i> [H. Fa	cility's Phone	777	
11-		Livespool, OH				10.0		<u>6)385-</u>	-1336	7
1	1. USE	OOT Description (Including Prop	per Shipping Name, Hazard Cla	ass and ID Number)	No.	ntainers Type	Total Quantity	Unit Wt/Vol	Waste No.
E a.		RQ Hazardous W	aste Solid, N.D.	s.			2.40			U188
ER	اسما	(Fhenol)-9 NA 30	דואן דרי		ı	4	DW	1105	P	
A b.	1	RQ Waste Comosiv	eliquid N.O.S-				+-		_	0002
e R		(Sortium Sulfide)	8 UNTED PG II	• -		/	DM	525	P	0003
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J.	Additio	onal Descriptions for Materials	Listed Above	-			K. Har	ndling Codes for	r Wastes L	isted Above
H.							1			
				•			1			
	•									
	•									
15	5. Spec	ial Handling Instructions and A	dditional Information	(24 H a.)	S-K Cus	loner	10#	0000-6	51-16	ag
15	5. Spec	sial Handling Instructions and A	dditional Information (800) & 468-1762)	(24 H r.);	5-K (us	lonex	10#	0000-6	51-16s	2G P2101
IĽ	WT1	- Approval #s!	11/2) OCKNO221 11	K) OCCNO	20			To	945	14_
IL	WTI	- Approval #s!	dditional Information (800) & 468-17(4) (ILA) (VLNB2 ILA) (VLNB2 ILA) ILA) (VLNB2 ILA) ILA) (VLNB2	K) OCCNO	20			To	945	14_
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81363-R4784 **ENVIROSYSTEMS** DANA CONTAINER

PREQUALIFICATION EVALUATION MANIFEST INFORMATION

REVISED: 06/20/96 RUN: 06/21/96

CONTROL #: SAMPLE #: 1610875-7 1048619

REQUIRED MANIFEST FORM:

SC

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

			. `						
	FORM HAZARDOUS ASTE MANIFEST	1	RATORS US NCD048461		DOCUM	MENT NO.	2.PAGE 1	ומאט	ERLINED AREAS
3.	GENERATOR NAME	AND MAI	LING ADDF	RESS		A. ST	ATE MAN	I FES	T DOCUMENT NO
	DANA CONTAINER 7254 MT HOLY RI)							
	CHARLOTTE	!	NC	28214		B. ST	ATE GEN	ERAT	OR ID
4.	GENERATOR PHONI	E 800	796 3262	•.					
	TRANSPORTER 1 (SAFETY-KLEEN CO		6. US EF	PA ID NO 84908202		C. ST T			NE
7.	TRANSPORTER 2 (CO NAME	8. US EF	PA ID NO		E. ST T			NE
	SAFETY-KLEEN CO 130-A FRONTAGE LEXINGTON, US DOT DESCRI	ROAD SC 2	9073	s	CD07799	95488		80:	LITY PHONE 3 356 4061
A. HM.	RQ WASTE FLAMM (TOLUENE&ISOPM 3 UN1993 PG I	ROPYL ACI	ETATE)	o.s.					F005 N/I
	ADDITIONAL DESC							к. на	ANDLING CODES
15.	SPECIAL HANDL	ING INSTI	RUCTIONS	AND ADD	TANOITI	INFORM	MOTTA		

EMERGENCY RESP#708-888-4660(24 HR). IF UNDELIVERABLE, RETURN TO GENERATOR.

81363-R4784

SAFETY-KLEEN CORP. NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

PAGE 1 OF

TO: SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD EPA ID: SCD077995488

LEXINGTON, SC 29073

UNDER MANIFEST NUMBER LINE NUMBER THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS. IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

HAZARDOUS WASTE CODES: F005 D001

TREATABILITY GROUP: NONWASTEWATERS

F001, F002, F003, F004 AND/OR F005 SPENT SOLVENT WASTES REGULATED HAZARDOUS CONSTITUENTS

TREATMENT STANDARD CONCENTRATION (TOTAL MG/L FOR WW, TOTAL MG/KG FOR NWW UNLESS NOTED AS "TCLP")

ETHYL ACETATE TOLUENE ** TOLUENE ***

33 10

28

EPA WASTE DESCRIPTION AND WASTE TREATMENT/REGULATORY SUBCATEGORY OR CODE REGULATED HAZARDOUS CONSTITUENT

TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE

D001 HIGH TOC IGNITABLE CHARACTERISTIC WASTE. RORGS; OR CMBST **

NOTES: *	THESE TREATMENT	STANDARDS	DO NOT PRECLUDE	SOLVENT RECOVERY OR
	USE AS FUEL PR:	R TO LAND	DISPOSAL.	

- NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
- *** TREATMENT STANDARDS APPLICABLE IN CERTAIN HWSA-AUTHORIZED STATES.
- ****AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

GENERATOR NAME: DANA CONTAINE	R	EPA ID: NCD	048461370
GENERATOR SIGNATURE (OPTIONAL):		
NAME & TITLE (OPTIONAL):			·
SAFETY-KLEËN SAMPLE NUMBER:	1048619	CONTROL NUMBER:	1610875-7

South Carolina Department of Health

1	and Environmental Control	~ 4 Jr.	. , ,	Emergency	8 Holidays: (303) 253-6488	
Ple	UNIFORM HAZARDOUS WASTE MANIFEST UNIFORM HAZARDOUS UNIFORM HAZARD	2.	Page of	1 Informati	ion in th uired by	e shaded areas Federal law, bu	
	3. Generator's Name and Mailing Address DAMA CONTAINER 7.254 MT HOLY ED CHARLOTTE NC 2.3.214	А. В.		Manifest Docum		er	
	4. Generator's Phone 5. Transporter Company Name 6. US EPA ID Number 7. Transporter 2 Company Name 8. US EPA ID Number	C. State Transporter's ID 524985 07 D. Transporter's Phone /-800-348- E. State Transporter's ID F. Transporter's Phone					
	9. Designated Facility Name and Site Address (200, 6.33) 10. US EPA ID Number SAPETY-KLEEN CORE. 130-A FRONTAGE ROW. SC 20073	н.		Facility's ID	356-4	.061	
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) 12. Conta	ainer: Ty	1	13. Total Quantity	14. Unit Wt/Vol	Waste No.	
	RO WASTE FLAMMABLE LIQUIDS, N.O.3. (TOLUENERISOPROPYL ACETRIE) 3 UN1993 PG II(FOOS)(ERG427)	L,		<u>uor40</u>	5 P	F 0 0 !	
E N E	RO WASTE FLAMMABLE CIQUIDS: 10.0.5. A COMMISSION OF STREET OF STRE	格の	19 1	ितिति	<i>i</i>) . P.	D 0 0 .	
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R	4 Ret Works Plannike weller Walt (Elfavol) (Elfavol) (ERS# 27) FOR	ij		01/50	P	1990	
	J. Additional Descriptions for Materials Listed Above. a. SKI100099 00099			K. Handling cod	es for waster	Listed Above	
	6. SKIII DIO 515 1000 H d. SKII/D 1015 1000 PV 15. Special Handling Instructions and Additional Information EMERGET CY RESET (6500) - 7/35 / 7/30 17 WIDELT VENABLE	ļ #.)23718 TURN TO		0-54-160 RATOR	
	SK CORP AUTHORIZED TO PETROM IN LEGEN EUPHRQUEED CAN	RR 36	TEU 40	IS NO N	ecess 05) i	ARY. 0.20/5	
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described aborand labeled, and are in all respects in proper condition for transport by highway according to applicable international and national get if I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generat be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a generation and select the best waste management method that is available to me and that I can afford.	overr ted to avai	nment r the d lable t	egulations and th egree I have det o me which mir	e laws of the termined to nimizes the	e State of South Ca	
¥	Printed/Typed Name Robowt F. House and Mollent D. Borne	d.				Month Day	
TRANSPO	17. Transporter 1 Acknowledgement of Receipt of Materials Printed(Typed Name Signature	1	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	a		Month Day	
ORTER	18. Transporter 2 Acknowledgement or Receipt of Materials Printed/Typed Name Signature					Month Day	
FAC	19. Discrepancy Indication Space	_ _ _ _		lbs. c. lbs. d.		tbs.	
1 1 1	20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						



Bureau of Solid & Hazardous Waste Mgt. 2600 Bull Street, Columbia, SC 29201 Phone: (803) 734-5200 Emergency & Holidays: (803) 253-6488

Please print or type. (Form Approved OMB No. 2050-0039. Expires 9-										050-0039. Expires 9-30-96						
	UNIFORM WASTE	HAZ	ARDOUS	1. Generator's		5 8 5 0	MANIFEST DOCUM		2. Pag of	1		d by I	e shaded areas is Federal law, but is			
	3. Generator's Name and Making Address DANA COUTINER 7254 MT HOLLY RD CHARLOTTE 4. Generator's Phone (704) 399-3395										A. State Manifest Document Number B. State Generator's ID					
	7. transporter 2	P 1 201 Company	EN CORP	Linoville	s. fall I L D	US EPA ID NU	1713131	0 -2 7 -7	D. Tre E. Ste F. Tre	E. State Transporter's ID F. Transporter's Phone						
	9. Designated Facility Name and Site Address 0006 30 10. US EPA ID Number SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073 S C D 0 7 7 9 9 5 4 8 8									cility's Pho	one 03 35	6 – 4(061			
	11. US DOT Descrip	tion (Inclu	uding Proper Shipping	Name, Hazard Class	, and ID Number)		12	. Cont	ainers Type	Total	13. Quantity	14. Unit Wt/Vol) i. Waste No.			
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A T	(ETHĂNO	OL)		ON VERGE	138, H'	o.s. 		101	DM	द्याख	4150	р	D 0 0 8			
		ptions for	r Materiais Listed Abo	ve.						K Han	idling codes fo	wastes	Listed Above			
	. [S K][/	OK	01217	7024	· [5/K]/	10101516	600	2,4								
	15. Special Handling	Instruction	OSS	ormation A . 1	0.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	INC TUE	ayar.	ë ni	4208 TURN	75 3 To-6	031 ENE	-01 RATOR.			
	SK COR	P 710	JEROGE S	D 10 Rs.	lāīnī gielā sadot		2015 B	4 ();	3648	ind h	IS NLC	ESS				
	and labeled, and large be economical present and f	nd are in quantity illy pract uture the	all respects in prop y generator, I certi ticable and that I reat to human hea	er condition for tran fy that I have a pro have selected the alth and the enviro	contents of this consignresport by highway accord ogram in place to reduce practicable method of noment; OR, if I am a so d that is available to me	ing to applicable in e the volume and treatment, storac mall quantity gen	ternational and toxicity of wast ge, or disposal terator, I have to the second control of the second control o	national go e generat currently	ed to the available	it regulation degree I i e to me wi	ns and the la have determ hich minimi	ws of the ined to res the	ssified, packed, marked, state of South Carolina.			
V	Printed/Typed Name	F	Haye	· §		Signature (A)	7 P. Hz	esp					Month Day Year / 1/0141916			
TRANSP	Printed/Typed Name	E.	LEE			Signature		(ラ ニ				Date Month Day Year / / / / / / / / / / / / / / / / / / /			
ORTER	Printed/Typed Name		edgement or Receipt			Signature					·		Date Month Day Year			
FACI	19. Discrepancy Ind	cation Sp パック	reklighen	mpuel 13 ;	1 Per Lan	aluly.	a b	11		lbs	. c . d	 	lbs.			
L I	20. FACILITY Owne	r or Opera	ator: Certification of fe	iceipt of hazardous m	aterials covered by this ma	nifest except as note	d in Item 19.									
Y	$\sqrt{2}$		/y /	10	7 78	1	2-11	2/)[-	}	Mgnth Day Year			

SAPETY-REEN CORP. (see adactined information) GENERATOR WASTE DETERMINATION CERTIFICATION

SK SURVEY NO. 1051795

NATURAL DE LA CARRACTE DE LA CARRACT

Generator Appa Container										
Waste Description Filler Pease Nobels	·	111 1502								
Process Description Material From Marcle Andre Tol	SAFET	TY-KLEEN CUSTOMER NUMBER								
A. The generator must determine if the material is excluded from regulation under 40 CFR 261. Yes No Sure 1. Is this material exempt from waste regulations under RCRA (i.e. not a "solid waste" per 40 CFR 261.2? 2. Is this waste exempt "used oil", for fuel or recovery, not disposal? (Ref. 40 CFR 279) 3. Is this waste exempt from regulation as a hazardous waste, per 261.4? If yes, explain why in Comments.										
IF ANY ANSWER IN SECTION A IS "YES", THEN STOP.										
B. The generator must determine if the waste is regulated as a	"listed" hazardous waste.	Yes No Sure								
1. Is waste listed as a hazardous waste in subpart D of 40 CFR par 2. Has waste been mixed with any other waste? (If yes, then descri 3. Has waste been treated in any way? (If yes, then describe starting)	be other wastes in Comments.)	Lorent Lo								
C. Generator must determine if the waste is regulated for every (Check one for each parameter or one for each section)	y characteristic under 40 CFR 261.30.	Yes No Partial								
Is determination based on laboratory analysis? (If yes, then a copy [Note that Safety-Kleen Corp. Prequalification Analysis may no										
Waste Code Parameter (Evaluation method) Yes No Sure	Waste Code Parameter (Evaluation method	Not <u>Yes No Sure</u>								
D001 Ignitability (see attachment)	TCLP Volatiles (SW-846 8240) D018 Benzene	<u> </u>								
D002 Corrosivity (see attachment)	D019 Carbon Tetrachloride D021 Chlorobenzene	Low								
D003 Reactivity (see attachment)	D022 Chloroform D027 Dichlorobenzene, 1,4-	100								
TCLP Metals (SW-846 6010 & 7000) D004 Arsenic D005 Barium D006 Cadmium D007 Chromium D008 Lead	D028 Dichloroethane, 1,2- D029 Dichloroethylene, 1,1- D035 Methyl Ethyl Ketone D039 Tetrachloroethylene D040 Trichloroethylene D043 Vinyl Chloride									
D009 Mercury D010 Selenium D011 Silver	TCLP Semivolatiles (SW-846 8270) D023 Cresol,o- D024 Cresol, m-									
TCLP Pesticides (SW-846 8080 & 8150) D012	D025 Cresol, p- D026 Cresols (total) D030 Dinitrotoluene D032 Hexachlorobenzene D033 Hexachlorobutadiene D034 Hexachlorobethane D036 Nitrobenzene D037 Pentachlorophenol D038 Pyridine D041 2,4,5-Trichlorophenol D042 2,4,6-Trichlorophenol									
California Hazardous Characteristics	Waste Extraction Test (WET) Static Acute Bioassay Procedure									
D. Comments Generator words Full TCLP analysis performed for unstended determination Thinks material is perhazardous (previous present of molecul (ed. 1. # 260380) supports (his).										
material is nonhazardous (previous prequal of motor and (colif. # 260 180) supports this).										
E. Generator Certification: On behalf of the Generator, I hereby warrant, represent, and certify that all information in this document is true, accurate, and complete; and that I am a duly authorized employee of the Generator. Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any damages, assessments, penalties, costs, attorney's fees, etc., arising out of, or in any way related to breach of the above warranty by the Generator.										
Name Robert F. Haces Sr	Title Ams. Container Manage Date 7/21/96 Phone	cr								
Signature Robert 7 Halle 12		<u>(204) 377 - 3395</u>								
Sales Representative Name Steve Charges	Branch No. 403450									

H EPA Waste Description and Treatment Standards

(COMPLETE ALL QUESTIONS WITHIN ONE SECTION ONLY).

CHECK ONE BOX ON LEFT

SK SURVEY NO. 1651795

IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (Ref. 40 CFR 261)

S	i	1. For hazardous wastes, if waste is	a "listed" waste, such as "spent solvent"	(F001-5), then show the applicable EPA	A Waste Codes:
S E C		F001 F002 F000	3	K086 Other, specify	
Ť			·		— — — Dot Applicable
Ö	Y		nerator must determine if waste exhibits a on, show all applicable EPA Waste Code:		ther based on knowledge or
I-1		D001 D002 D000	3 D004 D005 D006	D007 D008 D009 D010	0 D011
					— — — — Not Applicable
	S				
			des required by generating facility state:		None Required Not sure
S E C		1. Is this material exempt from wast	npt" wastes, see last page. ` e regulations under RCRA (i.e., not a "so t solvent for recovery; fuel oil for use as f		Yes (Skip to 4)
Z0	1		, for fuel or recovery, not disposal? (Ref. g oil; metal-working coolants; synthetic oi		Yes (Skip to 4)
I-2	N		ion as a hazardous waste, per 261.4? If y leum exploration and production from fie		Yes (Skip to 4)
	O	4. List all applicable State Waste Co	odes required by generating facility state:		None required Not sure
			BOXES ARE CHECKED IN SE NATION CERTIFICATION OR		UT A GENERATOR
-3			nable to identify the proper fety-Kleen's representative		ste to avoid delays e for a TCLP analysis and
		a Prequalification analy		<u> </u>	· · · · · · · · · · · · · · · · · · ·
ı	$\overline{}$	Safety-Kleen Corp. requires a repres	sentative sample and charges a fee for th	e prequalification of all new material. P.	0. No. 54454
	•	From 🗔	From Composite of d	in celleft	
1		Type of sample: Line Li	Tank LEI Composite of di	rums Sample taken by L	Customer L Safety-Kleen Representative
	J	Generator Certification (Not a waste	handling agreement):		
		On behalf of the Generator, I here	by warrant, represent, and certify that: at	I information submitted in this document	is true, accurate, and
. [complete; all known or suspected	hazards have been disclosed; and, I am	a duly authorized employee of the Gene	erator.
		Generator agrees to Indemnify an	d hold Safety-Kleen Corp. and its subsidi	aries harmless for any damages, assess	sments, penalties,
		-	out of, or in any way related to breach o	* *	_
		Name Robert F. Hage	5 Sc.	Title Deno Contai	ner Manager
		Signature X Reisen 12	Hoya- Ir	Date	ner Manager Phone (70") 399-3395
		Contact		9	Phone _()
		Comments Generater In	early full TCLP andre	is performed for has	le determination. Thinks
					-nle1. # 260780) supports
,		His).		7;	
		<u> </u>			
-			(1)	SK C/	Territory
		Sales Representative Name	ve Church	SK Employee Number	or 4200
		SK USE ONLY	le leaked in transit Survey nur	nber did not match sample label	Survey information incomplete
		Sample Received	Completed Survey Rec	cived	Survey Logged
		Comments -			
		Survey Entered By	Date	Survey Verified By	Date

safety-kleen.

MATERIAL SURVEY

SK	Political Control of	
USE	SAFETY-KLEEN CUSTOMER NUMBER	Control No.
δ 20	SK LINE OF BUSINESS #(EX. USE 24 FOR FRS, 28 FOR SKOS)	Lab No

SK SURVEY NO.

7.4.15.6.V	6				5
1153		2	7131	H	

Α	Generator Name Dana Container Corp.								
	Nature of Business Container Cleaning (Tanker Trucke) S.I.C. No								
	ID Numbers: Federal EPANCO074505750 State NC IDState ID								
	Status: Large Quantity Generator (LQG) Small Quantity Generator (SQG) Conditionally Exempt Small Quantity Generator (CESQG)								
В	Facility Street Address (No P.O. Boxes) [] Manifest Address Billing Name & Address (If Different) [] Manifest Address 210 (Example 100)								
	city Charlotte State NC zip 25014 City Avend State NJ zip 07001								
С	General Description of Material								
E	Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material. MSDS Attached								
	F-1 Determine if any of the following prohibited substances may be in the material. MUST BE COMPLETED! Yes No DOT Radioactive, Explosives, or materials forbidden from transport. TSCA regulated materials, Chlorinated biphenyls (PCB), Brominated biphenyls (PBB), Chlorinated dibenzodioxins or furans. Yes No Products used as pesticides, herbicides, insecticides, or by-products of pesticide manufacture. Human carcinogens above exclusion levels as defined by OSHA (Ref. 29 CFR 1910.1001-). Yes No Reactive components (Sulfides, Cyanides, Shock sensitive materials, Pyrophoric compounds). Biological hazards (such as Pathogenic materials, Infectious agents, Etiologic agents, USEPA Medical Waste). F-2 Determine if any of the following restricted substances may be in the material. MUST BE COMPLETED! Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver, Thallium). Water or amine-reactive components (such as unreacted Isocyanate monomers and resins, Acid chlorides, Anhydrides, Epoxides). F-3 If yes, then identify substances and concentration								
G	Proper Shipping Name Silica (Net USOOT at USEPA I backdors Malerial) Hazard Class P.G. Not DOT Hazardous Material Not sure								
	SK USE ONLY Accepted for Analysis Accepted Conditionally Suspended for More Information Rejected Comments								
	Safety Evaluated By Date								



G

A

Printed/Typed Name

Printed/Typed Name

. TIN

South Carolina Department of Health

Bureau of Solid & Hazardous Waste Mgt. and Environmental Control 2600 Bull Street, Columbia, SC 29201 Phone: (803) 734-5200 1541 _ Emergency & Holidays: (803) 253-6488 PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter) Form Approved. OMB No. 2050-0039 Expires 9-30-91 NIFORM HAZARDOUS 1. Generator's U.S. EPA ID'No. Manifest 2. Page 1 Information in the shaded areas is not re-WASTE MANIFEST of N₁ C₁ D₁ O₁ 7₁ 4₁ 5₁ O₁ 5₁ 8₁ 5₁ O₁ **9**² quired by Federal law, but is by State law. 3. Generator's Name and Mailing Address A. State Manifest Document Number Dana Container 7254 Mt. Holly Road Charlotte, NC 28214 B. State Generator's ID 4. Generator's Phone (704) 399-3395 5. Transporter 1 Company Name 6. U.S. EPA ID Number C. State Transporter's ID NCD980799142 STAT, Inc. D. Transporter's Phone 704-396-2304 1 N C D 9 8 0 7 9 9 1 4 2 7. Transporter 2 Company Name 8. U.S. EPA ID Number E. State Transporter's ID F. Transporter's Phone 9. Designated Facility Name and Site Address 10. U.S. EPA ID Number G. State Facility's ID SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD H. Facility's Phone 803-773-1400 SUMTER, SC 29150 , S, C, D, 0, 3, 6, 2, 7, 5, 6, 2, 6 11. U.S. Dot Description (including Proper Shipping Name, Hazard Class, and ID Number) 12. Containers 13. Total Quantity 14. Unit I. Waste Number Type F 0 0 3 a RQ, Waste Flammable Liquid, n.o.s., (contains ethyl acetate & methanol), 3, UN-1993, III (F003, F005, D001) F 0 0 5 0,0,2 DIM 00,0,9,6 GA D 0 0 1 b. d. J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above: หลายใหม่ เพราะ และ เมื่อนเพลง (ซีรีริต เป็น คลิสต์ (ชาวะเรียก) ใน ેપ્યું માર્ગિનાની તેને હોઈ છે હતા છે. માર્ચી ત માર્જી હતા. લેવને મેં તેમ મોલા તેમ હિંદ મુખ્ય જાણ કરે છે. a. SE-14420-F101013 Use guide #26 ose guide #20 15. Special Handling Instructions and Additional Information In case of fire or spill call Public reporting burden for this collection of information is estimated Public reporting burden for this collection of Information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 2046u; and to the Office of Information and Regulatory, Affairs, Office of Management and Budget, Washington, D.C. 20503. STAT, Inc. Contact Garry Sparks Item A-RQ is 100 lbs. 704-396-2304. After 5PM Call State origin of waste is NC Garry 704-754-2315 or Jerry Work order #1637 Sparks 704-754-8737. 24 hr emergency #1-800-424-9300 (CHEMTREC)

16.GENERATOR'S CERTIFICATION: Thereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Signature

Signature

ALYANDH

	CHARLEY FERRELL I	Chal	ley trevell I	10,1,0,6,9,4
TR	17. Transporter 1 Acknowledgement of Receipt of Materials		0 ,	
A	Printed/Type Name	Signature	1/10	Month Day Year
ANSP	WAYNE HELL	Waya	Nall	10110694
Ŕ	18. Transporter 2 Acknowledgement of Receipt of Materials			
Ë	Printed/Typed Name	Signature		Month Day Year
Ř				
	19. Discrepancy Indication Space 14 P =		· 689	
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Ų		<u> </u>	<i>A</i>	
÷	20. Facility Owner or Operator; Certification of receipt of haz	ardous materials covered by this r	manifest except/as noted in item 19.	

Bureau of Solid & Haz 2600 Bull Street, Colum Phone: (803) 734-520 Emergency & Holidays

PLEASE PRINT O	or TYPE (Form de	signed for use on	elite [12-pitch] typ	pewriter)		Forn	n Appro	oved. OM	3 No. 20		
NIFORM HAZARDOUS WASTE MANIFEST	1. Generator's U.S.		Manii Docume	fest	2.	Page 1	1	nformation uired by I	in the s	VE.	
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nerator's Phone (7494) 3319 349	ent of the same					B. Sta	te Ger	erator's	D		
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PRATOR'S CERTIFICATION: I hereby de		of this consignme	ent are fully and as					Management			
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ma large quantity generator, I certify that I h scable and that I have selected the practica th and the environment; OR, if I am a small cod that is available to me and that I can af	ble method of treatmer I quantity generator, I h	nt, storage, or disp	osal currently ava	ilable to	me	which i	ninimiz	es the pr	esent an	d future 1	threat
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SOUTHEASTERN CHEMICAL

GENERATORS NOTIFICATION OF TREATMENT REQUIREMENTS FOR WASTES RESTRICTED FROM LAND DISPOSAL UNDER 40 CFR 268 SUBPART D

MANIFEST NUMBER:

EPA ID NUMBER: M. 1074505850

EPA WASTE CODE: 1995 (1995)

PROFILE NUMBER: St. - 14/4/20-F003

TREATMENT STANDARDS

	Check Here		
	If Contained	Waste	All
	In Waste	Water	Other
Enns Fone Comment Columns	III Waste		
F001 - F005 Spent Solvents		mg/l	mg/l
Acetone		0.05	0.59
Benzene		0.07	3.70
n-Butyl Alcohol		5.00	5.00
Carbon disulfide		1,05	4.81
Carbon tetrachloride		0.05	0.96
Chlorobenzene	<u>·</u>	0.15	0.05
Cresols (cresylic acid)		2.82	0.75
Cyclohexanone	<u> </u>	0.125	0.75
1,2,-Dichlorobenzene		0.65	0.125
Ethyl acetate	<u></u>	0.05	0.75
Ethylbenzene		0.05	0.053
Ethyl ether		0.05	0.75
Isobutanol		5.00	5.00 .
Methanol		0.25	0.75
Methylene chloride		0.20	0.96
Methyl ethyl ketone		0.05	0.75
Methyl isobutyl ketone		0.05	0.33
Nitrobenzene		0.66	0.125
Pyridine		1,12	0.33
Tetrachloroethylene		0.079	0.05
Toluene		1.12	0.33
1,1,1-Trichloroethane		1.05	0.41
1,1,2-Trichloro-1,2,2-Trifluoroethane		1.05	0.96
Trichloroethylene		0.062	0.091
Trichlorofluoromethane		0.05	0.96
Xylene		0.05	0.15
California List		Level mg/l)	Treatment
Halogenated Organic Compounds		1000.	Incineration
Arsenic (As) Nonwastewaters		500.	none
Mercury (Hg) Nonwastewaters		20.	none
Nickel (Ni)		134.	none
Thalium (Ti)		130.	none
Chlorinated Biphenyis (PCB's)		50.	none
		20.	HOHO

D Codes	Description	Wastewaters	Nonwastev	vaters	
(D001)	Wastewaters (< 1.0% wt TOC and TSS)	268.42(a	<u> </u>	NA	
See Seems of	Low TOC (< 10 wt% TOC)	NA	, <u>—</u>	268.42(a)	
	High TOC (≥ 10 wt% TOC)	NA NA	1	268.42(a) RORGS, FSUBS	OR INCIN THUS
	Ignitable compressed gases based on			200.12(0) 1.01.00; 1.0000	, 0.1 110111
	261.21 (a)(3)				
	Ignitable reactives 261.21 (a)(2)				
D002	Corrosives, all subcatagories & CA List	264.42(a	,	264.42(a)	
D004	Arsenic (As)	268.43(a		268.41(a)	
D005	Barium (Ba)	268.43(a		268.41(a)	
D006	Cadmium (Cd)	268.43(a		268.41(a)	
D007	Chromium (Cr)	268.43(a		268.41(a)	
D008	Lead (Pb)	268.43(a		268.41(a)	
D009	Low Mercury (< 260 ppm Hg)	268.43(a		268.41(a)	
	High Mercury (≥ 260 ppm Hg)	268.43(a		268.42(a)	14
D010	Selenium (Se)	268.43(a		268.41(a)	7
D011	Silver (Ag)	268.43(a		268.21(a)	

I have determined in 40 CFR Part 268.7 (a) (1) that this waste is restricted and requires treatment prior to land disposal.

Prior to disposal of this waste in a landfill, it must be shown to meet treatment standards as set forth in 40CFR part 268, Subpart D, Section 268.41 (b).

Refer to 40CFR part 268, Subpart D Appendix I for a description of the applicable test method required for demonstration of compliance with the treatment standard.

SIGNATURE

TITI E

1016/10

GENERATOR NAME/LOCATION:

NOTE: PLEASE ATTACH WASTE ANALYSIS DATA. (OPTIONAL) DATE:

21214

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION NAME DANA CONTAINER
ADDRESS 7254 MT. HOLL VROPHONE (704) 399- 3395
CITY CHARLOTTE STATE NO. ZIP 38214 EPA /MANIFEST NO. DO. 74505850 / C.
EPA / MANIFEST NCD 074505850 / 9400 ID. NO. / DOCUMENT NO
ACCUMULATION 7-28-93 EPA FOOI, FOO WASTE NO. DOO!
"FLAMMABLE Liquid"

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE

BENZENE WASTE OPERATIONS NESHAP CERTIFICATION

Please check	one box	below v	which i	indicates	your	status	in regar	d to	the	reporting
requirements	under 40) CFR I	Part 61	Subpart	FF.	This s	tatement	mus	t ac	company
<u>each</u> shipmer	it regardle	ess of w	hether	the refer	ence	d regui	lation is	appli	cabl	e to you.

This waste does not contain benzene which is required to be controlled and treated in accordance with the provisions of 40 CFR 61 Subpart FF [§61.342(f)(2)].

"This waste contains benzene which is required to be controlled and treated in accordance with the provisions of 40 CFR 61 Subpart FF [§61.342(f)(2)]."

"I certify under penalty of law that the above information is true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Signature: Charly Ferril II Date: 116194

Print Name and Title: CHARLEY FERRELL II Compliance Myn.

Stream Se-14420- F003

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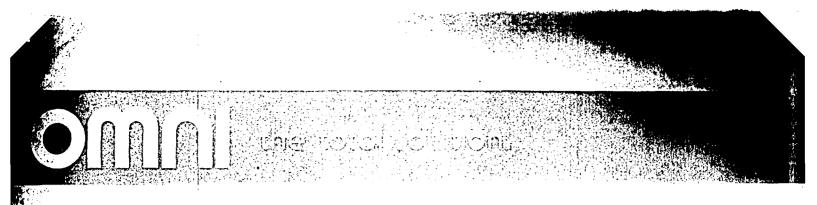
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CERTIFICATE OF RECYCLING/MATERIALS RE-USE

Generator:

DANA CONTAINER

Address:

7254 MT HOLLY ROAD 28214 CHARLOTTE NC

I.D. Number:

NCD074505850

Manifest Shipment No.:

94001

Date of Shipment:

01/06/94

Southeastern Chemical I.D. No.: SCD036275626

Facility Address:

755 Industrial Blvd.

Sumter SC 29151

On the above date, your waste material was picked up and transported to our facility for the purpose of recycling and/or fuel blending. Any recycled material was returned to either the original generator or subsequent user for beneficial re-use.

If any residue remained or the original intent of the shipment was for fuel blending, the material was blended at our facility and subsequently shipped off-site to any one of four EPA approved rotary cement kilns where the material was used for fuel, resulting in its complete destruction.

Any containers were emptied and either recycled at our facility or shipped off-site for recycling at a licensed drum reconditioner.

THIS ENTIRE PROCESS IS GENERALLY COMPLETED WITHIN A 30-DAY PERIOD FROM THE DATE OF THE SHIPMENT.

HAZARDOUS WASTE

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENER	ATOR	INFOR	imati	ON;

NAME Jana Container

ADDRESS 7254 Mt Holly Road

GITY Charlotte STATE NC ZIP 28214

EPA NO. NCD 074505850 EPA WASTE NO. F003 F005, D001

ACCUMULATION MANIFEST START DATE ______ DOCUMENT NO.

(contains formardehyde) 3, UN-1993

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

Printed By: Lab Safety Supply Inc., Janesville WI 53547-1368

Reorder No. 4

IS 00001

the total solution.

January 19, 1994

Dana Container 7254 Mt Holly Road Charlotte NC 28214

ATTN: Charley Ferrell III

Dear Mr. Ferrell:

Please be advised that on <u>January 6 1994</u>, we received a waste shipment from your company under Hazardous Waste Manifest <u>94001</u>. The following discrepancies were noted for which corrective actions are required.

14a. should be G instead of Ga.

The discrepancies and the corrective actions have been high-lighted on the manifest. Your signature constitutes approval of the above-noted corrective actions. This letter must be returned within 15 days from the date of receipt; otherwise, this will become an EPA reportable discrepancy which could require further actions. Please keep the enclosed manifest and one copy of this letter for your records.

If in the future, you should make any change or note a discrepancy regarding your waste manifest, please indicate in #19 and <u>initial</u>. By doing this, a letter of discrepancy can be avoided. Above all, never use white-out to change a manifest. Should you have any further questions, please contact Joy Alexander at the number below. Thank you for your prompt attention to this matter.

Generator Signature

SOUTHEASTERN CHEHICAL & SOLVENT

Joy Alexander

encl:

Manifest

(7043993395)

Dureau ct Sorid & mazardous Waste Mot 2600 Bul. Street. Co.umbia SC 29201 Phone 1803, 734-5200

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Sureau c: Soid & nazardous Waste Mct 2600 Bul. Street. Columbia. SC 2920: Phone (803) 734-5200

PLEASE PRIN	Tor TYPE Form of	resigned for use on elite	112-pitchl type	ewriteri	Form			-0039 Ezoires 9-36-9	
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20 Facility Owner or Operator Certification of receipt of nazardous materials covered by this manifest except as noted in Item 19

Printed Typed Name



South Carolina Department of Health and Environmental Control

Bureau C: Sond & Hazardous Waste Mc: 2600 Bul. Street. Columbia SC 2920: Phone (803) 734-5200 Emergency & Holigays (803)253-6488

Form gesigned for use on eite [12-bitch] typewriters Form Approved OMB No 2050-0039 Expires 9-30-9 2 Page 1 UNIFORM HAZARDOUS 1: Generator S US EPA ID No Manifest Information in the shaded areas is no M. D. D. 9. 8. 0. 5. 5. 5. 1. 8. 9.0.2. 3.6.5 required by Federal law but is by State law WASTE MANIFEST 3 Generator's Name and Mailing Address Clean Harbors of Baltmore, Inc. A. State Manifest Document Number 1910 Russell St. 410-244-8200 B. State Generator s ID Baltimore, MD 21230 4. Generator's Phone i 6. U.S. EPA ID Number C. State Transporter s ID 5 Transporter 1 Company Name 1 M(A | D | O | 3 | 9 | 3 | 2 | 2 | 2 | 5 | 0 | D. Transporter's Phone 617-849-1800 Clean Harbors Env. Services, Inc. E. State Transporter's ID 8. U.S. EPA ID Number 7. Transporter 2 Company Name From HORBORD ENU Service: The MIAIDIO 31913121 22 STUF Transporter's Phone 4/1 10. U.S. EPA ID Number G. State Facility's ID 9. Designated Facility Name and Site Address. Giant Resource Recovery SC Highway 453 North @ I-26 H. Facility's Phone S,C,D,0,0,3,3,5,1,6,9,9 803-496-7676 Harleyville, SC 29448 12. Containers 13. Total Quantity 11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) 14 Und L Waste Number RO, Waste Flammable Liquid, N.O.S (Methyl Ethyl Ketone, D 1_0:_0:_1 Kerosene),3,UN1993,PGII 13/0.514 b. K. Handling Codes for Wastes Listed Above J. Additional Descriptions for Materials Listed Above * [H, V] - [F, 0, 4, 5, 7] - [M, 3, 3, 1] VC# 0011, po18, 0021, p035, VC# 0039, Fca5, va2, u220, 9442193 u231, F003 15 Special Handing Instructions and Additional Information DC# < 3:97 HWH# 160 ine form Send comments realizing the budgen estimate including suggestions for realizing this burger. 15 Chief Information Poiss Branch PM:223 US Environmental Protection Agency 401 MST Sick Washington D.C 20403 and to the Omice of Monmation and Hegulators. Onice of Management and Budget Washington. D.C. 20503 IN CASE OF EMERGENCY CALL 1-800-OIL-TANK EKG#27 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipbing name and are classified packed marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and If I am a large quantity generator. I certify that I have a program in brace to reduce t practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human pealing and the environment OR of lam a small quantity generator in the made a good fails effort to minimize my waste generation and select the best waste management method that is available to me and that I can alford Printed/Typed Name Year Barry Taggart Transporter 1 Acknowledgement of Receipt of Materials Prynied/Tyged Name Year I JOHNSTON) 18 Transporter 2 Acknowledgement of Receipt of Materials Anid 19 Discrepancy Indication Space 11 22171): : : 1 . . . 20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 Printed / Typed Nam

100 (Rev. 9788) Previous Editions are Obsolete | IDHEC 1988 (Rev. 5789))

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T. FLAMMABLE LIQUIDI OR NA NO. 1993
GENERATOR INFORMATION AME DAVA CONTANEN
ADDRESS 7254 MT. HOLLY Rd. PHONE (704) 399-3395
Charlotte STATE N.Q. ZIP 282/4
D. NO. NCD074505850 EPA WASTE NO. DOO!
START DATEDOCUMENT NO
CONTAINS HAZARDOUS OR TOXIC WASTES PROPER SHIPPING NAME FLAMMABLE WASTELIGUID
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CONTAINER LOG

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IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T. FLAMMABLE WASIZ LIQUID UN OR NA NO. 1993
GENERATOR INFORMATION 7) AWA OCH TRULER
ADDRESS 7254 MT. HOLLY RAPHONE (104) 399-3398
CITY Charlotte STATE NO ZIP 282/7
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CONTAINER LOG PAGE OF : LOCATION: CHARLOTTE, NC DOT SHIPPING NAME: TWO MAIN CONSTITUENTS: ____ & ___ NON-HAZARDOUS __ HAZARDOUS __ DOO1 __ TCLP __ LISTED WASTE ACCUMULATION START DATE: CONTAINER NUMBER: PRODUCT ____ DATE WORK ORDER # PH GALONS

COMMENTS:



South Carolina Department of Health

2600 Bul. Street. Columbia. SC-2020: Prone (803, 734-5200 Emergency & Horidays 18031253-6488

and Environmental Control

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16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accipanced. Marked, and labeled, and are in all respects in proper condition for transport by highway according the laws of the State of South Carolina.	uratery desc 10 applicab	ribed a le intern	bove by proper ship national and nation:	n doåeru Dind us	nie and are classified iment regulations and
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HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

PROPER D.O.T. SHIPPING NAME Elaphall C. ave

GENERATOR INFORMATION

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N' Maria Company

ADDRESS 7254 POR HOLL HONE 304 397-33

CITY CHARLOTTE N. G. STATE ___ ZP

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ACCUMULATION SOME MANAGEST AND DOCUMENT NO

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME

UN OR NA ID. NO.

D.O.T. PROPER SHIPPING HAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

CONTAINER LOG

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IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION

NAME DANA CONTAINER

ADDRESS 7254 MT. HOLLY PHONE (704) 399-339.

EPA / MANIFEST NC DO74505859 ID. NO. / DOCUMENT NO.

ACCUMULATION START DATE

12-22-93

EPA WASTE NO.

CELAMMABLE LIGUID

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

ERADY, SIGNMARKS DIV. CATALOG NO. 632



CONTAINER LOG

PAGE __ OF __

	: LOCATI	ON: CHARLOTTE	, N	IC ·			•	٠.
	DOT SH	IPPING NAME:		FLAMMARLE	LIQUID			
		IN CONSTITUEN		_				٠.
	•	-HAZARDOUS		X HAZARDOUS X DO		P	LISTED WAST	·F
			_	E: 12.22.94			_ 3.01.01	_
		NER NUMBER:						
	DATE	WORK ORDER	<u>#</u>	PRODUCT		PH	GALONS	
10	પ્રો <u>ဆ19</u> 3		_	1866 Resin	MATCACK		1.0	
þ	1 <u>28/9</u> 3		-	ETHYLENE	<u></u>		4.5	
1	14197	<u> </u>	_	PETROLEUM LUB			5.0	
	11		-	11			<u>5.0</u>	
	11	1	_	11			5.0	
	11			· <u>II</u> ,	· · · · · · · · · · · · · · · · · · ·		3.0	
•	1)		_	Lube OIL			<u>5.0</u>	
	112194	NOS 7777	-	USED OIL (WAST			5.0	
٠.	1/12/94	NOS 7777	-	11 (WAST			1.0	
	1.3-99	Out -	_	Petroleum oil	MATLACK		9.0	
· · ·	1-8-	74	- ·	•	MATLACK.		<u>2.0</u> 3.0	
)	1-28-94		-	155W4D OIL				
	2 <u>-1-94</u>		<u>.</u>	Lube Oil	11 1		4.50	
	2-21-94		_	Waste Oil	Henitage		3.00	
	2-21-94		- '	Waste Oil		· —	4.00	
•	2-21-94		_	11 (1		_	4.00	
	<u> </u>					 .		
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					TOTAL	<u> </u>	58.0 GA	J
•	COMMEN	TS:						

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T. El 2 a man 2-2 y = / i / i / i / i / i / i / i / i / i /
SHIPPING NAME FLANMABLE LIQUIDUN OR NA NO. 1993
GENERATOR INFORMATION
NAME DANA CONTAINER
ADDRESS 7254 MT. HOLLY Rd. PHONE
CITY CHARLOTE, STATE N.C. ZIP 28214
EPA NO. NCD074505850 EPA WASTE NO. 1001-F003
ACCUMULATION 5-23-94 MANIFEST START DATE
CONTAINS HAZARDOUS OR TOXIC WASTES
PROPER SHIPPING NAME FLAMMABLE LIQUID.
TECHNICAL CHEMICAL NAME
Dow- Enz
UN OR NA IO. NO
HANDLE WITH CARE!

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CONTAINER LOG PAGE OF LOCATION: CHARLOTTE, NC DOT SHIPPING NAME: FLAMMABLE Liquid TWO MAIN CONSTITUENTS: SOLVENTS & WASTE GAS NON-HAZARDOUS HAZARDOUS **X** D001 LISTED WASTE TCLP ACCUMULATION START DATE: CONTAINER NUMBER: ILCOMIS DATE WORK ORDER # PRODUCT GALONS MANARDI 17680 15.0 SOLVENTS (CETIN HARBURS (FLAM, WASTE) 278

COMMENTS:

PROPER D.C	U.S. ENVIP	IONMENTAL	PROTECTION A	GENCY	, .
SHIPPING N		A=NA	UN OR	NA NO	,
GENERAT	OR INFORMAT	Con	NAMER		سيبيد
ADDRESS	7254	MT. H	SCLY REHOND	(104) 399-33	95
1/2	harlotte	1		NC. ZIP 288	<u> </u>
EPA ID. NO.	<u> </u>	and said and the	PA IASTE NO		
START DATE	$\frac{100}{2}$	1.100000000000000000000000000000000000	IANIFEST OCUMENT NO		
COI		AZARDOU <i>HLDHA</i>	IS OR TOXI	C WASTES	
	PPING NAME —— CHEMICAL NAME	NAPT	HAL		
UN OR NA ID		Stepping NAME	UND UN OR NA NO. WT	TH DOEELX	·
	HANI	MEV	VITH	:AREI	

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CONTAINER LOG

PAGE __ OF __

LOCAT	ION: CHARLOTTE, N	<u>IC</u>	
DOT S	HIPPING NAME:	ALPHA NAPTHA	
TWO M	AIN CONSTITUENTS:	▲	
иои	N-HAZARDOUS 🐪 🔉	HAZARPOUS DO01 TCLP LIS	TED WAST
ACCUM	ULATION START DAT	TE: 3 23 94	
CONTA	INER NUMBER:	<u>=L00007</u>	
DATE	WORK ORDER #	PRODUCT PH GA	LONS
	WORK ORDER #	ALPha-NAPThA	35
		Caustic	20 A
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Commei	NTS:		

ROPER DISPOSAL FEDERAL LAW P

IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T. SHIPPING NAM UN OR NA NO. **GENERATOR INFORMATION**

miHANNAR

ACCUMULATION START DATE MANIFEST.

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME TECHNICAL CHEMICAL NAM

UN OR NA ID. NO.

MATCACK

<u>=UMMM</u>

CONTAINER LOG

PAGE __ OF __

	IN CONSTITUENT	ALPHA- NAPTI S: SAME &		
	N-HAZARDOUS	HAZARDOUS DO01	TCLP	LISTED WAS
	JLATION START D	ATE: 3-23-94		
	INER NUMBER: 3	· · · · · · · · · · · · · · · · · · ·		
DATE	WORK ORDER #	PRODUCT	PH PH	GALONS
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CONTAINER LOG

PAGE __ OF __

	ON: CHARLOTTE, N				
DOT SHI	IPPING NAME:	ALPHA-NA	PTHA		
	IN CONSTITUENTS:		&		
иои-	-HAZARDOUS	HAZARDOUS	D001	TCLP	LISTED WAST
ACCUMUI	LATION START DAT	E: 3 23 94		-	•
CONTAIN	NER NUMBER:	L 00015			
DATE	WORK ORDER #	PRODUCT	00-110	<u>PH</u>	GALONS
· 		ALPHA- NA	APTHA		30.01
		Causua			<u> </u>
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COMMENT	TS:	•	•		

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	U.S. E	UBLIC SAFET NVIRONMENT		Y OR THE TON AGENCY	
PROPE	R D.O.T.	LPhA-1	VAPTOR	. UN OR NA NO	2811
GENE	RATOR INFOR	MATION 9 Con	HAINER	,	
/ ADDRI	ss 725	4 MT.	HOLLY RI	PHONE 704)399-3395 2114
		能與熱性質的物質性。以下,	医白斑 医二十二十二	STATE NO.	ZIP 282/4
	The the wild trained here to take	74505850		2002	
ACCUI START	MULATION 3	23/94	MANIFEST DOCUMENT N	10	.
PROPE	CONTAIN:	S HAZARD	OUS OR	TOXIC WA	STES
TECHN	ICAL CHEMICAL!	LANE	VAPIHA		% 24 36 E43
	NA EN MA		U.NO	. 2811	

D.O.T. PROPER SHIPPING MANE AND UN OR NA NO. WITH PREFIX

MATCACK



CONTAINER LOG

PAGE __ OF ___.

TWO MAIN CONSTITUENTS: TetrahydroFurgu & varwish NON-HAZARDOUS HAZARDOUS V DOO1 TCLP LISTED WAS ACCUMULATION START DATE: 3-23.94
TWO MAIN CONSTITUENTS: Tetrahydrofurgu & varwish NON-HAZARDOUS HAZARDOUS V DOO'S TCLP LISTED WAS
NON-HAZARDOUS HAZARDOUS DOO1 TCLP LISTED WAS
ACCUMULATION START DATE: 3-23.94
nocomobalion black Dale. O V J. / /
CONTAINER NUMBER: IL-00014
to#
DATE WORK ORDER # PRODUCT PH GALLONS
3-21 Tetrahydro Furan 494503 5
" " " 5
<u>v</u> , <u>u</u> 5
<u>n</u> <u>v</u> <u>5</u>
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<u>n</u> <u>u</u> <u>u</u> <u>5</u>
" 5 " 5 " 5 " Varnish 688 5
<u>" </u>
<u> </u>
3-21 " 5 50.0

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T. FLAMMI	ABLE LIQU	UN OR NA NO. —	<u> 1993</u>
GENERATOR INFORMATION	Contan	eR	
ADD 1254 1	MT HOLLY	Rephone	
CHARLOHE		STATE AC. Z	28214
EA UCDO7450S	5850 EPA WASTE NO		
ACCUMULATION 3/23/	94 MANIFEST	T NO	·
CONTAINS HAZ	ARDOUS OF	TOXIC WAS	STES
PROPER SHIPPING NAME	LAMMABLE	LIQUID	······································
TECHNICAL CHEMICAL NAME			
UN OR NA ID. NO.	010.19	793	·
D.O.T. PROPER SHI	PPING NAME AND UN OI	R NA NO. WITH PREFIX	re*

HANDLE WITH CARE!

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NORTH CAROLINA HAZARDOUS WASTE MANIFEST

Plea	ase print or type. (Form designed for use on eli	te (12-pitch) typewriter.)			Form	Approved. OMB N	o. 2050	-0039.
	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA II N C D 0 7 4 5	4 10	Manifest ocupient No. FIOIO Z	2. Page of			e shaded areas d by Federal
Н	3. Generator's Name and Mailing Address	Dana Containe	r '		A. Stat	e Manifest Docum	ent Nu	nber
H		.7254 Mt. Holl				<u> Santagoria, </u>		
П		Charlotte, NC	28214		B. Stat	e Generator's ID		
	4. Generator's Phone (704) 399-339							007001/0
	5. Transporter 1 Company Name	6.	US EPA ID Numbe			e Transporter's IC		
	STAT, Inc.		D 9 8 0 7 9			nsporter's Phone		396-2304
	7. Transporter 2 Company Name	8.	US EPA ID Numbe	er		e Transporter's IC		
			US EPA ID Numbo		<u> </u>	sporter's Phone e Facility's ID		
	9. Designated Facility Name and Site Address Laidlaw Environmental Serv	oices (TS). Inc		er .		NCD0006484	51	
	208 Watlington Industrial		•			ility's Phone	71	
	Reidsville, NC 27320	INIC	D 0 0 0 6 4	81 41 51 1	l	1-800-334	-594	(3
			1 21 01 9 9 01 3	12. Conta		13.	14.	
1	11. US DOT Description (Including Proper Shipp	ing Name, Hazard Class, a	nd ID Number)	No.	Type	Total Quantity	Unit Wt/Vol	l. Waste No.
G	a. Hazardous Waste Liquid, r	.o.s., (contai	ns tetrahydro	5-				
N	furan) 9, NA-3082, PG II (•	1	ابديا			D001
E				D011	UM	001055	_خ	
R	PRQ, Waste Flammable Liquid	l, n.o.s.,(cont	ains alpha					
T 0	naptha) 3, UN-1993, PG III	(D001)	-	100	N N	a		D001
R				<u>UND</u>		201165	G	
	cRQ, Waste Flammable Liquid, ethyl ketone & kerosene) 3 F005, D001, D011, D018, D021, I	n.o.s., (cont	ains methyl					002,F003, 005,D001,D0
	ethyl ketone & kerosene)	3, UN-1993 PG I	II (F002,F00	3,200	h	<u>ለ</u> ለ . 2 . 2 . አ	أرم ا	018, D021, D0
	F003,0001,0011,0018,0021,1	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	0039,0220)	UNE	וייוון	DUUUU	U	035,0039,00
ı	d. f						4	039,0220
1								
1	J. Additional Description for Materials Listed Abo				K Han	dling Codes for W	actos	isted Above
1	Item A-approval #RVID0101		RQ is 100 1bs					
	Item B-approval #RVID0102		of waste is		Ite	ms A-C use	gui	de #26
1	Item C-approval #RVID0103	Work order #						en de la companya de La companya de la co
								•
	15. Special Handling Instructions and Additional	Information	· ····					
	In case of fire or spill o	all STAT, Inc.	Contact Gar	ry Spark	s 70	4-396-2304	4. A	After
	5PM contact Garry at 1-800)-627-1451.						,
H	·							
	16.GENERATOR'S CERTIFICATION: I her proper shipping name and are classified							
П	according to applicable international and natio			•	•	•	Oi tian	sport by mgmway
	If I am a large quantity generator, I certify that I							
	economically practicable and that I have selected future threat to human health and the environment							
	the best waste management method that is ava		afford.		_/_			
	Printed/Typed Name	777	Signature	1 h	10	pralle		Month Day Year
<u>'</u>	CHARLET FEXX	Ell-	Cilia		<u> </u>	Well-L		060279
Ħ	17. Transporter 1 Acknowledgement of Receipt of I	Materials	Signature					Month Day Year
A N S P	RAHNIF SOADI	K <	TY ON	ري زور	2000	U		
P	11011112 OPTIX	Motoriale	1 10000	~~ ~		• •		DEDAME
Ŗ	18. Transporter 2 Acknowledgement of Receipt of I Printed/Typed Name	waterials	Signature					Month Day Year
ORTER								
<u>:-</u>	19. Discrepancy Andication Space	10	<u> </u>	1 1	7	- >5		
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Ă	Nb Shall Read (KD) Wepter 5	James DR Liguis	s Comstein	#>, 5 U	429	عر بن الله	(1/4	Land ac Doll
C	(Zipice)	かかんのうろして、エ	3 mora hace	INDS di	, me	work her	1451	,
Ī	20. Facility Owner or Operator: Certification of rece		overed by this manifest	except as note	d in item	7/		· · ·
Y	Printed/Typed Name		Signature	1/1,	1///	<i>y</i>		Month Day Year
	DAVID WILLS		VI SIGHT	/ [/]	111	'n	4	06106191



HAZARDOUS MATERIALS WASTE DISPOSAL

LAIDLAW ENVIRONMENTAL SERVICES (TS), INC.
ROUTE 11, BOX 3 208 WATLINGTON INDUSTRIAL ROAD
REIDSVILLE NC 27320-

Mail To: INDUSTRIAL BROKERAGE SERVICES

P.O. BOX 1263

LENOIR NC 28645-

Attention: DAVID HAYNES

Pickup Address: DANA CONTAINER

7254 MT. HOLLY ROAD

CHARLOTTE NC 28214-

EPA 1D: NCU074505850

Manifest No: RVIDO-94003

This is to certify that hazardous material removed from _______ DANA CONTAINER

has been disposed of in accordance with all applicable local, state and federal regulations in the following manner.

Container	Date	Location	Method
940606-RVIDO-001	06/22/94	LAIDLAW ENVIRONMENTAL SERVICES (TOC), INC.	INCINERATION
RVIDO101		ROEBUCK SC	
940606-RVIDO-002	06/14/94	LAIDLAW ENVIRONMENTAL SERVICES (TOC), INC.	INCINERATION
RVIDO102		ROEBUCK SC	THO THE TANK
940606-RVIDO-003	06/14/94	LAIDLAW ENVIRONMENTAL SERVICES (TOC), INC.	INCINERATION
RVIDO102		ROEBUCK SC	INCINCALION
940606-RVIDO-004	06/14/94	LAIDLAW ENVIRONMENTAL SERVICES (TOC). INC.	INCINEDATION
RVIDO102		ROEBUCK SC	INCINERATION
940606-RVIDO-005	07/08/94	LWD, INC.	INCINEDATION
RVIDO103			INCINERATION
940606-RVIDO-006	06/15/94		Ecline
RVIDO103	•		r 30B3
.940606-RVIDO-007	06/17/94		Ecune
RVIDO103		***	r5085
940606-RVIDO-008	06/17/94		Ecuno
RVIDO103			Langa
940606-RVIDO-009	06/17/94	•	Ecuno
RVIDO103			L2082
940606-RVIDO-010	06/15/94		ECURA
RVIDO103			F3083
RVIDO102 940606-RVIDO-005 RVIDO103 940606-RVIDO-006 RVIDO103 .940606-RVIDO-007 RVIDO103 940606-RVIDO-008 RVIDO103 940606-RVIDO-009 RVIDO103 940606-RVIDO-010	07/08/94 06/15/94 06/17/94 06/17/94		INCINERATION INCINERATION FSUBS FSUBS FSUBS FSUBS FSUBS

Thomas W. Collier

Operations

Date: 07/23/94

DATE 9324

60 Commerce Drive, Buffalo, NY 14218 (716) 827-7200	ET ATOMINIOSSOFOSSOF
PICK UP	DELIVERY
s DANA CONTAINER PORP	C NAME
	- O STREET
H STREET 1 1254 W. Holloy Rd, P CITY STATE ZIPCODE	S 3700 LAGERNER Rd.
P CAALOTTE NC.	S JOOD LABRANCE RN. GITY STATE ZIPC G NEWCASTLE KY.
P CAALOTTE NC. E CONTACT NAME PHONE	G NEU-COSTLE 171
R SOUTH	N CONTACT NAME PHO
SCHEDULED TIME	E PARTY OF THE PAR
1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	进入5000000000000000000000000000000000000
ADDITIONAL INFORMATION	Pursuant to 6NYCRR 372.2 (b)(2)(ii), HazMat certifies that it is
	authorized to deliver this shipment of manifested waste to the TSDF listed on this Bill of Lading
	ADDITIONAL INFORMATION
	
!	
PURCHASE ORDER NO. WORK ORDER NUMBER MANIFEST NU	MBER 2 H.M. NUMBER
PURCHASE ORDER NO. WORK ORDER NUMBER MANIFEST NUMBER	11/74 HM. NUMBER 44872
LOAD NUMBER TRACTOR NUMBER TRAILER NUMBER	BER DRIVER'S NAME
Hin 2/872 125 35	
TYPE (CIRCLE ONE) MATERIAL D	DESCRIPTION QUANTITY
STRAIGHT TRUCK WAS TE CORRE	CORE KINGH, G. IDM
VAC WASTE SALVE	10 0 HDM
DUMP	
CVAN	
ROLL-OFF BOX #	
PICK UP	DELIVERY
PICK UP DATE V- //- 1/6	DRIVER DAY #1 DATE
	· 1.
ARRIVAL TIME 1430 AM RELEASE TIME 1430 AM	ARRIVAL TIMEPM RELEASE TIME
DAY # 2 DATE	AM
AM AM	DAY #2 DATE ARRIVAL TIME PM RELEASE TIME
ARRIVAL TIMEPM RELEASE TIMEPM	DAY #3 DATE ARRIVAL TIME PM , RELEASE TIME
TRAILER EMPTY UPON ARRIVAL YES YES NO	TRAILER CLEAN AND EMPTY UPON DEPARTURE YES
DIP MEASUREMENT (Tankers Only) INCHES	(If not, explain below—)
COMMENTS: (EXPLAIN ALL DELAYS)	COMMENTS: (Explain all delays or discrepancies)
LARD - LAPERWORK	
HAZMAT MATERIALS USED (ex. overpacks, etc):	·
1	<u> </u>
IF YES EXPLAIN:	I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATIO
I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS	
TRUE AND COMPLETE.	TRUE AND COMPLETE.
Robert & Maryey 1-11-96	CONSIGNEE'S SIGNATURE Dat
SHIPPER'S SIGNATURE / Date	CONSIGNEE'S SIGNATURE Dat

MILWE SAL RESTRICTION CERTIFICATIONINO. **CATION FORM**

Check One: Wastewater D Non-wastewater D

Anniest Document Number: 7//7/0

An accordance with 40 CFR 263.7, I have listed the necessary information to properly certify and/or manage this waste(s) in accordance with the Land

Disposal Restriction sanulards as set forth in 40 CFR 268 and any applicable probabition levels set forth in 40 CFR 268.32 or RCRA section 3004(d). Consider Name: Device Contriner Losp. GODGE OF USEPA ID#: NCBO74505850 91196

•				_	 —-	
	Manifest Line #	ll a	116	116		
	Waste Code, Subcategory and/or Constinuents of Concern	1183	2002	0003		
	UHCS • YG/No/ NA	NA	Yes	Yes		
	Certification** Notification	A	A	A		•
	Manifest Line #					
	Waste Code, Subcategory and/or Constituents of Concern					
	UHCS * Yes/No/ NA					
	Certification (Notification					

Complete and attach an Underlying Flarardous Countrowns Form if Underlying Flarardous Constituents (UHCs) are present and the waste contains any of the UNEPA Waste Codes: D001 (except High TOC Ignatable Liquids Subcategory or is treated by CMBST or ROROS of 40 CFR 268.42, Table 1); D002, D003, D012-D043 (not treated in a non-CWA, non-CWA equivalent or a non-SDWA facility); and F001-F005, F039.

2 Certification/Notification

- > This waste does NOT meet applicable trasment standards as set forth by 40 CFR 268, or, applicable probibition levels set forth in 40 CFR 268.32, or, ECRA section 3004(d) and requires further trasment before land disposal.
- Ħ I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the transment standards specified in 40 CFR part 268, subpart D and all applicable prohibitions are forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are arguificant penalties for submitting a false certification, including the possibility of fine and imprisonment. (268.7(a)(2)(ii))
- ? Jecrify under penalty of law that I personally have examined and am familier with the waste and that the lab pack does not commin any wastes identified at Appendix IV to Part 263. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment. (268.7(a)(8))
- Ħ I certify under penalty of law that I have personally examined and am familiar with the treatment vectorology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268, subpart D, and all applicable probabilities set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the probability watte. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment. (268.7(b)(5)(i))
- 177 I certify moder penalty of law that the wante has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant egables for submitting a false certification, including the possibility of fine and imprisonment. (268.7(b)(5)(ii))
- ۳ support this certification and that, beard on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the nonwesterwester organic constituents have been trested by incincration in units operated in accordance with 40 CFR part 264, subpart 0 or 40 CFR part 265, subpart 0, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwesterwester organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant panalities for submitting a false certification, including the possibility of fine and imprisonment. (268.7(b)(5)(iii)) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to
- R I certify under penalty of law that the debris have been treated in accordance with the requirements of 40 CFR 268.45. I am sware that there are significant enalties for staking a false certification, including the possibility of fire and imprisonment. (262.7(d)(3)(iii))
- × I certify under penalty of law that the waste has been trested in accordance with the requirements of 40 CFR 268,40 to remove the hazandous characteristic. This decharacterized waste contains underlying larizedous continents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment. (268.7(b)(3)(v))
- 7 I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic, and that underlying hazardous constituents, as defined in Sec. 268.2, have been treated on-site to meet the Sec. 268.48 Universal Treatment Standards. J am awere that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment. (7.68.7(b)(5)(v))

I hereby certify that I believe that the in	Signature Relievit 7 Mins
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Technologies industries does not warrant that the use of this form will constitute compliance with applicable law in all jurisdictions



NORTH CAROLINA HAZARDOUS WASTE MANIFEST

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039 1. Generator's US EPA ID No. UNIFORM HAZARDOUS Information in the shaded areas is not required by law NCD0745058509 WASTE MANIFEST Az State Manifest Document Number 3. Generator's Name and Mailing Address Dana Container 7254 Mt. Holly Road the statement of the privile B. State Generator's ID Charlotte, NC 399-3395 4. Generator's Phone (704 5. Transporter 1 Company Name US EPA ID Number C/State Transporter's IDNCD980799142 D. Transporter's Phone 704-396-2304 STAT, Inc. INICIDI 91810 1719 1914 4 7. Transporter 2 Company Name US EPA ID Number E. State Transporter's ID F. Transporter's Phone G. State Facility's ID 9. Designated Facility Name and Site Address US EPA ID Number Laidlaw Environmental Services (TS), Inc. NCD000648451 208 Watlington Industrial Drive H. Facility's Phone Reidsville, NC 27320 12. Containers 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Type a. Hazardous Waste Liquid, n.o.s., (contains tetrahydrofuran) 9, NA-3082, PG II (D001) 00110M0010351G RQ, Waste Flammable Liquid, n.o.s., (contains alpha naptha) 3, UN-1993, PG III (D001) cRQ, Waste Flammable Liquid, n.o.s., (contains methyl ethyl ketone & kerosene) 3, UN-1993 PG III (F002, F003, 01060M003300 G F005, D001, D011, D018, D021, D035, D039, U002, U039, U220) J. Additional Description for Materials Listed Above Item A-approval #RVID0101. Items B & C-RQ is 10021bs Items A-C use gu Item B-approval #RVID0102 State origin of wasteris NC Work order #1734 Item C-approval #RVID0103 15. Special Handling Instructions and Additional Information In case of fire or spill call STAT, Inc. Contact Garry Sparks 704-396-2304. 5PM contact Garry at 1-800-627-1451. 16.GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, that make a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford 17. Transporter 1 Acknowledgement of Receipt of Materials somi Spa 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature 19. Discrepancy Indication Space weste to 4239 hastead at 1203 able Liquids Consideross. 3 un 2924 PG III (NOI) Pour Black I should have Door as the Waste no. Instead 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Printed/Typed Name

AVIC

NAME OF WASTE STREAM

MATERIAL PROFILE NO

RVIDO 104

AT A			EAUDEAD
,			ENVIRONMENTAL SERVICES
[] New	(Ame	endment	

Alpha Naptha

A. GENERATOR INFORMATION Generator Name Dana Contains R Facility Address 7254 Mount Hally R City/County Charlotte State NC USEPA ID# NCD074505850	Telephone (Fax () Billing Nam Billing Addr	huy 1396-43 no Industrial ress P.O. Box	Blokorase 1263 State NC Zip	Sonicas
USEPA ID#	Attention — Telephone (()		EXT
B. DOT Shipping Name WASTE FLAMMABLE COCCOSIUR, N.O.S., 3, UN 2924 Hazard COUN/NA No. LW 2924 Packing Group III C. RCRA RCRA Non Hazardous/Exempt? Yes No FLANY CLAN Out State Waste Codes: EPA Waste Codes:	Class 3Process Generating:	D. ANNUAL REPORT SIC Code: Source Code: _A Form Code: _B Origin Code: System Type: _M	PCB's Cyanides Sulfides Pesticides	
F. PHYSICAL CHARACTERISTICS AT 70° F				V
1. Infectious or Biological Waste? Yes No Densit 2. NRC Regulated Radioactive? Yes No Densit 3. Reactivity None Water Reactive Pyrophoric Shock Sensitive Cyanides DOT Explosive PH Gas (Cylinder) Solid % 73 Aerosol Sludges % 73 Lab-Pack Free Liquids 100 % 14 Layers None Medium High High High Color/Appearance: Oanana A Color/Appearance: Oanana	Ibs./gal. (US, liq) Veight	act(\	Dermal Toxicity LD ₅₀ (Mg ≤40	sinon halation? ☐ Yes ☐ Ne 1) ☐ >5, ≤50 ☐ >200 ☐ >500 ented drums? ☐ Yes ☐ No ble? ☐ Yes ☐ No to the National Emission Waste Operations Yes ☐ No s an ozone depleting ☐ 82)? ☐ Yes ☐ No scrap metal pieces
G/METALS	<u> </u>		5 gl. pail	Cty. Container Cubic Yard Box* Super Sack* Rolloff/Dump Trailer Tanker* Other Week

Generator's Certification:

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the materials tested are representative of all material described by this profile.

Generator's Authorized Signature:

terrell I

7-5-94

Date

ENVIRONMENTAL SERVICES

CUSTOMER NOTHICATION AND CERTIFICATION

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		· KUIDOU	ひこうどりかひき	()2)	RV100102			
Masie i forne Manifest Nor	where GL.	1003	. J					
EPA Hazardo	us Waste Numbe	100 POOL DO	11/1/00/1/1/02	5, 0039	F002 F	003 FCC5	(1102)	uas
Waste Analys	is Attached?	YES	NO		On file at 1	C(,	220	
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	I notify that I a that the waste	on familiar with the wa is subject to the treatm	ste through analysis and ent standards specified	in 40 CFR 26	8, Subpart D. Was			
	Corresponding	Treatment Standard:	see attac	hed F	orein B			
	(5a) I certify treatment procobtaining this the performance RCRA Section submitting a factor of the treatment responsible for in units operational substitution in nonwastewater there are sign	under penalty of law tess used to support this information, I believe to levels specified in 4 a 3004(d) without impends e certification, includant process used to support optaining this informated in accordance with nits operating in accordance constituents difficant penalties for	that I have personally certification and that, be that the treatment process of CFR Part 268. Subpartissible dilution of the ing the possibility of finat I have personally exappent this certification tion, I believe that the result of the example of the process with applicable espite having used best submitting a false certification at the example of the example o	eased on my inquest has been open D, and all as prohibited was no and imprison and that, base converted to open O) or 40 e technical recognification, incomplication, incomplication, incomplication of the state of	guiry of those indiversated and maintain pplicable prohibitions. I am aware the sument. I amiliar with the todon my inquiry organic constituent CFR part 265, suguirements, and I pristio analyze for luding the possil	riduals immedia ined properly so ons set forth in at there are signi- creatment techno- of those indivi- is have been trea- bpart O, or by have been un- such constituen- bility of fine of	tely responsite as to complete to CFR 265 ificant penaltic penalti	ble for y with .32 or ies for eration diately eration in fuel ect the re that ment.
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Generator Name/Location: Dana Cordainer 7254 MH Holly Rd Charlotte Mc 28214

EPA ID Number: 1705 074505850 Manifest Number:

Sheet I of ____ Sheets

Wase Profile Category of Wase Code Variance Date Spin Category (Wase Code) Variance Da	EPATONO	mer;		<u> </u>	Manii (st Number:				
101 2 1001 7107 10 1000 305 10 100 1000 1000 1000 1000	or ARF	Category #	EPA or State Waste Code	Variance Date		Treatability Group (WW or NWW)	40 CFR Ref.	Specific Treatment Technology	Legend#	Other
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Dana Container 7254 Mt Holly Rd Charlotte ne 2824 EPA ID Number: NCX 074505850

ONLY ORIGINAL SIGNATURES WILL DE ACCEPTEDE

Sheet 1 of ___ Sheets

EPA ID NO					st iximber:			2.0	rate and Admin
Waste Profile or ARF	- Category #	EPA or State Waste Code	Variance Date	Sub Category	Treatability Group (WW or NWW)	40 CFR Ref	Specific Treatment Technology	Legend #	Other
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ENVIRONMENTAL SERVICES

CUSTOMER NOTIFICATION AND CERTIFICATION

Only Statements with Original Signatures will be Accepted!

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	Generator Nat	me/Location:	ana Contai	ner 12	51 111 //0	lly Kd	Charlette	111C, 2	8214
	EPA I.D. Num	1ber: 1000	74505850						
	Waste Profile	or ARF Designatio	" KNIDO10	1 RV	<u> </u>	<i>1</i> 271	00103	·	
K	, Manifest Num	ıber:							
~	EPA Hazardou	us Waste Number(s	. DOOI, DOI	11,0021,	NO35, J	039 FC	102 FOCS F	1005 1.1002	<u>juus</u>
	Waste Analysi	is Attached?	•				On file at facility.	<i>((220</i>	
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	V .	Restricted Waste	Notification (Categor	v 2)	•. •	•			
		I notify that I am that the waste is s	familiar with the was subject to the treatine	te through anal ent standards s	pecified in 40 Cl	FR 268, Subj			
		Corresponding Tr	eatment Standard:	see as	tached	FORM	1 B		
		(5a)- I certify und treatment process obtaining this info the performance I RCRA Section 30	der penalty of law the used to support this commation, I believe the evels specified in 40 04(d) without impensional terms of the control of	nat I have pers certification and at the treatmen CFR Part 268 nissible dilution	onally examined that, based on that process has be a Subpart D, and the prohibit	my inquiry of en operated : I all applicab ed waste, I a	those individuals in and maintained prop le prohibitions set f	unediately responerly so as to com onth in 40 CFR 2	sible for ply with 68.32 or
		of the treatment responsible for ob- in units operated substitution units nonwastewater or	process used to sup- taining this informati- in accordance with a operating in accord ganic constituents de-	port this certified on, I believe the 40 CFR part 2 dance with apprize having use	ication and that lat the nonwaster 64, subpart O) oplicable technic led best good fai	, based on rewater organic for 40 CFR potal requirements the efforts to a	ny inquiry of those constituents have be art 265, subpart O, ents, and I have be enalyze for such con	individuals immentreated by inci- or by combustion en unable to de stituents. I am aw	nediately neration in fuel tect the vare that
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Generator Name/Location: And Conflagner 725/1 ml EPA I.D. Number: MCD 07/15 05 8:50 Waste Profile or ARF Designation: RVID 0101 RVID 0102 Manifest Number: EPA Hazardous Waste Number(s): D001 D011 D021 N035 Waste Analysis Attached? YES NO Restricted Waste Notification (Category 2) I notify that I am familiar with the waste through analysis and test that the waste is subject to the treatment standards specified in a regulatory treatment standard or, by the appropriate regulatory treatment Standard: SEE ACCIOACA Treated Waste Notification (Category 5) (5a) I certify under penalty of law that I have personally exant treatment process used to support this certification and that, based obtaining this information, I believe that the treatment process used to support this certification and responsible for obtaining this information, including the possibility of fine an (3b) I certify under penalth of law that I have personally examined the treatment process used to support this certification and responsible for obtaining this information, I believe that the noun in units operated in accordance with 40 CFR part 264, subpart substitution units operated in accordance with 40 CFR part 264, subpart substitution units operating in accordance with applicable tenonwastewater organic constituents despite having used best good there are significant penalties for submitting a false certification that there are significant penalties for submitting a false certification that there are significant penalties for submitting a false certification that there are significant penalties for submitting a false certification that there are significant penalties for submitting a false certification for the treatment process used to support that the waste has been treated aware that there are significant penalties for submitting a false certification penalties for submitting a false certification penalties for submitting a false certification for the penalties for submitting a false certification for the penalties for submitting a false			(38)	DY.					
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	Generator Certl	<u>(ication</u>				•
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•	PRINT NAME:	CHARLEY	FERRE	ZLII TITLE:	TANK a	IASH MGI
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NORTH CAROLINA HAZARDOUS WASTE MANIFEST

n of type (form designed for use on elite (12-pitch) typewriter.)			Approved. OMB No.	The state of the s
WASTE MANIFEST 1. Generator's US EPA ID No. 1. Generator's US EPA ID No. N C D 0 7 4 5 0 5 8	5 0 9 9	Z of		In the shaded in the quired by Federal
3 Generator s Name and Mailing Address Dana Container 7254 Mt. Holly Road Charlotte, NC 28214 4 Generator's Phone (704) 399-3395			te Generator's il	44 July 1984
STAT, Inc.	A ID Number 0, 7, 9, 9, 1 A ID Number	4 2 D. Tre	te Transporter's ID insporter's Phone : \ te Transporter's ID	100
		F. Tra	nsporter's Phone	
9 Designated Facility Name and Site Address GSX - LAIDLAW ENVIRONMENTAL SERVICES, (TS), INC. 208 Watlington Industrial Drive Reidsville, NC 27320 N C D 0		H. Fa	ite Facility's ID cility's Phone 119) 342-611	oe Like
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Numl		2. Containers No. Type	13. Total Quantity V	14. Unit VVVol
RQ, Waste Flammable Liquid, n.o.s. (contains naptha), 3, UN-1993, PGIII, (D001)	alpha O		00010	G About
RQ, Waste Flammable Liquid, n.o.s., (contains athyl ketone & kerosene), 3, UN01993, PGIII, F003, F005, D001, D011, D018, D021, D035, D039, U002,	(F002, 0039,	HODDIN	0010/10	
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in 160 1bs. Stem A-approval fR	VIDO102 VIDO103	(Y) (1)	ding Codes for Wa	
15. Special Handling Instructions and Additional Information In case of fire or spill call STAT, Inc. Conta After 5:00PM call Garry at 1-800-627-1451. 24	ct Garry hr. emer	Sparks a gency #1	704 – 396–2 -800–424–93	304, 00 (CHEMTREC)
16.GENERATOR'S CERTIFICATION: I hereby declare that the contents proper shipping name and are classified, packed, marked, and labeled, according to applicable international and national government regulations, and all applicable international and national government regulations, and all applicable international and national government regulations, and all applicable international and national government in place to reduce the conomically practicable and that I have selected the practicable method of treatment, future threat to human health and the environment; OR, if I am a small quantity generate the best waste management method that is available to me and that I can afford.	and are in all pplicable state law volume and toxicit storage, or dispose	respects in p vs and regulation ty of waste general currently avail	roper condition for ons. erated to the degree I able to me which mir	transport by highwa have determined to be himizes the present and
Printed Typed Name CHARLEY FERREZL III Signature	harle	2 Fe	relit	Month Day Y
17: Transporter 1 Acknowledgement of Receipt of Materials - Printed Typed Name ROARK Signature	James	11	Boark	Month Day X
Transporter 2/Ackhowledgement of Receipt of Materials Printed/Typed Name Signature				Month Day Ye
Strepancy indication Space				
Operator Certification of receipt of hazardous materials covered by the	his manifest except	as noted in ite	n 192-12 (1931)	



NORTH CAROLINA HAZARDOUS WASTE MANIFEST

Plea	se print or type. (Form designed for use on elite (12-pitch) typewriter.)	Form Approved. OMB No. 2050-0039. Expires 9-30-94					
	UNIFORM HAZARDOUS 1. Generator's US EPA ID No. Manifest N C D 0 7 4 5 0 5 8 5 0 7 4 5 0 5 6 6 6 6 6 6 6 6 6	Z 2. Page 1 Information in the shaded areas of 1 is not required by Federal 2					
	3. Generator's Name and Mailing Address Dana Container	A. State Manifest Document Number					
	7254 Mt. Holly Road Charlotte, NC 28214	B. State Generator's ID					
	Charlotte, NC 28214 4. Generator's Phone (704) 399-3395						
	5. Transporter 1 Company Name 6. US EPA ID Number N C D 9 8 0 7 9 9 1 4	C. State Transporter's ID NGD 80 / 2 D. Transporter's Prione / 104 = 200					
	7. Transporter 2. Company Name 8. US EPA ID Number	E. State Transporter's ID					
		F. Transporter's Phone					
Ш	9. Designated Facility Name and Site Address 10. US EPA ID Number GSX - LAIDLAW ENVIRONMENTAL SERVICES (TS), INC.	G. State Facility's ID					
	208 Watlington Industrial Drive	H. Facility's Phone					
	Reidsville, NC 27320 N C D O O 6 4 8 4 5						
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) No.	ontainers 13. 14. Unit Unit WitVol . Waste No.					
E	a. RQ, Waste Flammable Liquid, n.o.s. (contains alpha	GB0010 G 7005					
E	naptha), 3, UN-1993, PGIII, (D001)	201 90002					
A	RO. Waste Flammable Liquid, n.o.s., (contains methyl	F002					
o	E TIME 1003 POTTY (FOR2)	2 DIM 0010 110 G 10018 DE					
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	d , 7 (2) (2) (2) (2) (3) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4						
	Additional Description for Materials Listed Above Ttems A&B=RQ is 100 lbs. Item A-approval #RVID0102	K: Handling Codes for Wastes Listed Above					
	State origin of waste is NC Item B-approval #RVID0103	Use guide no. 26					
	Workorder: #1767						
7	15. Special Handling instructions and Additional Information						
	In case of fire or spill call STAT, Inc. Contact Garry Spa After 5:00PM call Garry at 1-800-627-1451. 24 hr. emergen	rks at 704-396-2304, 2006 (Alexander #1-800-424-9300 (CHEMTREC)					
	After 5:00PM call Garry at 1-000-027-1421. 24 hi: emergen	(C) #1000 424 3300 (C)					
3	16.GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment						
	proper shipping name and are classified, packed, marked, and labeled, and are in all respinable according to applicable international and national government regulations, and all applicable state laws an						
	If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of economically practicable and that I have selected the practicable method of treatment, storage, or disposal cur						
	future threat to human health and the environment; OR, if I am a small quantity generator I have made a good the best waste management method that is available to me and that I can afford.	faith effort to minimize my waste generation and select					
	Printed Typed Name Signature Signature	Month Day Year					
-	17. Transporter 1 Acknowledgement of Receipt of Materials	108061					
Ř	Printed/Typed Name Signature Signature	Month Day Year					
SP	JANNY LA KOTKK Dany	T. TOOTH DISPISITY					
ORTER	18. Transporter 2 Acynowledgement of Receipt of Materials Printed/Typed Name Signature	Month Day Year					
E							
-	19. Discrepancy Indication Space	ha Nophtha), 9, NA 3077, PGIII					
F	Line I la should read Hazardous Wask Solid, NOS (alp.	hyl ethyl Ketons. Kerosene), 9.					
د-ن	NA 3077, PGII Line Ia.	edd DOOZ					
Ţ	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as n	oted in item 19.					
	Donnie Strader	Month Day Year					

South Carolina Department of Health

2600 Bull Street, Columbia, SC 29201

Form Approved. OMB No. 2050-0039 Expires 9-30-91

Phone: (803) 734-5200

Emergency & Holidays: (803)253-6488

Bureau of Solid & Hazardous Waste Mgt

and Environmental Control (Form designed for use on elite [12-pitch] typewriter) PLEASE PRINT or TYPE Generator's U.S. EPA ID No.
C D 0 7 4 5 0 5 8 5 0 ORM HAZARDOUS Manifest **WASTE MANIFEST** DANA CORPORATION 3. Generator's Name and Mailing Address 7254 MT. HOLLY ROAD CHARLOTTE, NC 28214

UNIFORM HAZARDO WASTE MANIFEST		S. EPA ID No. 4 5 0 5 8 5 0	Manife Decume	2.	Page 1 of		in the s ederal la	shaded areas is not aw, but is by State law
3. Generator's Name and Mailing Address	DANA C 7254 MT	CORPORATION T. HOLLY ROAD				e Manifest Documer	nt Numb	er
4. Generator's Phone ()	3395 CHARLO	OTTE, NC 28214	· 			e Generator's ID	רויאי	980799142
5. Transporter 1 Company Name STAT, INC.		6 U.S. EPA ID Num	ber 7 9 9 1	1 4 2	D. Tran	e Transporter's ID isporter's Phone		-396-2304
7. Transporter 2 Company Name	•	8. U.S. EPA ID Num	ber			e Transporter's ID		
						sporter's Phone		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
9. Designated Facility Name and Site Add SOUTHEASTERN CHEMICAL AN 755 INDUSTRIAL ROAD		10. U.S. EPA ID Nur	mber	ļ		e Facility's ID		
SUMTER, SC 29150	<u> </u>	1S1C1D10131	6,2,7,5,	6,2,6			03-77	3-1400
11. U.S. DOT Description (including Pro	per Shipping Name, Llazard	Class, and iD Number	r)	12. Cont No.	ainers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
RQ, Waste Flammable Liq 2, UN-1993, PG III (F001,	F002, F003, D001)			002	DM L	1,1,0,	G	F001 F002 F003 D001
b RQ Waste Flammable Liqu choloride) 3, UN-1993, PG	III (F003, F002, D00	01)		001	DM	55.	G	F003 F002
C RQ Waste Flammable Liqu UN-1993, PG III (F003, F0		formaldehyde) 3	,	001	DM L	55	G	F003 F005
d. RCRA & DOT Non-Regular lube waste spent olls)	ted, Non-Hazardous	Material (contai	ns	002	DM L	1,1,0, ,	G	7777
<u>. </u>	ed Above 0 0 1	E A 2 0 7	1 6 9 	90		dling Codes for Wa	•	
15. Special Handling Instructions and Additional Arc RQ is 100 lbs. State origin of waste is NC Work order #1782 24 hr emergency #1-800-424-5		In case of f STAT, Inc. Sparks 70- 5PM call G 1451.	Contact G 396-2304.	After -627-	average; minutes f for review the form, suggestic Branch, f Washing	37 minutes for generato for treatment storage and ving instructions, gather . Send comments rega ons for reducing this PM-223, U.S. Environme- ton, D.C. 20460; and to the ton, D.C. 20460; and to the ton, D.C. 20460; and to the ton, D.C. 20460; and to the properties of the send of the ton, D.C. 20460; and to the properties of the ton, D.C. 20460; and to the ton br>ton the ton ton the ton ton ton ton ton ton ton ton	ors, 15 minud disposal ing data, ar urding the burden, to natal Protected Office of the control	of Information is estimated to utes for transporters, and 10 facilities. This includes time nd completing and reviewing burden estimate, including or Chiel, Information Policy ction Agency, 401 MSL, S.W., the Information and Regulatory Washington, D.C. 20503.
6: GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that I can afford.								
Prigted/Typed Name A. MA	Thrus	Signature	A	Ma	uk	u~	ا ا	Month Day Year
17. Transporter 1 Acknowledgement of Re	ceipt of Materials	()						
Printed/Typed Name TANNY L. ROA		Signature anny	1 L.	Ba	uk	<u> </u>	ا اـــــــــــــــــــــــــــــــــــ	Month Day Year
18. Transporter & Acknowledgement of Re- Printed/Typed Name		Signature .					1	Month Day Year
19. Discrepancy Indication Space						a 17.69	libs.	481 libs

Printed/Typed Name 200

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Signature

20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

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South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt 2600 Bull Street, Columbia, SC 29201 Phone: (803) 734-5200

Emergency & Holidays: (803)253-6488

	VNIFORM HAZARDOUS 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents Page 1. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Documents 1. Generator's U.S. EPA ID No. N. C. D. O. S. EPA ID No. N		Page 1 of 1	Information	in the sh	aded areas is not but is by State law.	
A second	3. Generators Name and Mailing Address DANA CORPORATION 7254 MT. HOLLY ROAD CHARLOTTE, NC 28214 764 399-3395	A. State Manifest Document Number B. State Generator's ID					
	4. Generator's Phone (/) 5. Transporter 1 Company Name 6. U.S. EPA ID Number 7 9 9	C. State Transporter's ID NCD980799142 D. Transporter's Phone 704-396-2304					
a della co	7. Transporter 2 Company Name 8. U.S. EPA ID Number	E. State Transporter's ID F. Transporter's Phone					
2.4	9. Designated Facility Name and Site Address 10. U.S. EPA ID Number	5.6.2.6	G. State Fa	s Phone	303-773	-1400	
	11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Con No.	tainers 13	. Total Quantit		I Waste Number	
GEN	a RQ, Waste Flammable Liquid, n.o.s., (contains acetone & oil) 3, UN-1993, PG-III (F001, F002, F003, D001)	002	DM	1,9,,,	G	F001. F002 F003. E001	
ERATO	b. RQ. Waste Flammable Liquid, n.o.s., (contains acetone & methyl choloride) 3, UN-1993, PG III (F003, F002, D001)	001	DM	55	G"	F003 F002	
R	c. RQ: Waste Flammable Liquid, n.o.s., (contains formaldehyde) 3, UN-1993, PG III. (F003, F005, D001)	100	DM 5	5	G	F003 F005	
	RCRA & DOT Non-Regulated, Non-Hazardous Material (contains lube waste spent oils)	002	DM	١,٥,١	Ğ	7777	
	J. Additional Descriptions for Materials Listed Above 9 E	K. Handling Codes for Wastes Listed Above					
	15. Special Handling Instructions and Additional Information Items A-C RQ is 100 lbs. State origin of waste is NC Work order \$1782 24 hir emergency \$1-800-424-9300 (CHEMTREC) In case of fire or spi STAT, Inc. Contact of Sparks 70-396-2304. Sparks 70-396-2304.	Gairy . After	average: 37 i minutes for to for reviewing the form. Se suggestions Branch, PM- Washington,	minutes for general reatment storage a instructions, gath- ind comments re- for reducing this 223, U.S. Environn D.C. 20460; and to	itors, 15 minut and disposal fa ering data, and garding the b s burden, to nental Protection the Office of In	information is estimated to es for transporters, and 10 cilities. This includes time to completing and reviewing urden estimate, including urden estimate, including Chief, information Policy on Agency, 401 M SL S.W., information and Regulatory /ashington, D.C. 20503.	
₩	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and ac packed, marked, and labeled, and are in all respects in proper condition for transport by highway according the laws of the State of South Carolina. If and a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of practicable and that I have selected the practicable method of treatment, storage, or disposal currently averable health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize that I can afford.	g to applicat of waste gene vailable to me	rated to the which min	onal and nation degree I have imizes the pre	determined sent and fu	nent regulations and d to be economically ture threat to human	
ुः •	Printed/Typed Name Signatule Signatule	Ma	uku		, M	onth Day Year	
RANS	17. Transporter 1 Acknowledgement of Receipt of Materials Printed / Tyged Name Signature Lanny Lanny L	Ro	rek	, a	M	onth Day Year	
PORTER	18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature				M N	onth Day Year	
FACIL	19. Discrepancy Indication Space			a	lbs. c	lbs.	
Ť	20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except Printed/Typed Name Signature	pt as noted i	ltem 19.		8	onth Day Year	



É Printed/Typed Name ? ☐

South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mo 2600 Bull Street, Columbia SC 29201

Phone: (803) 734-5200 Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] ty	ypewriter)	Form	Approved. OMB I	No. 2050-0	0039 Expires 9-30-
N. C. D. O. 7. 4. 5. 0. 5. 8. 5. 0. Description of the control of		Page 1 of J			aded areas is no , but is by State lav
3. Generator's Name and Mailing Address DANA CORPORATION 7254 MT. HOLLY ROAD CHARLOTTE, NC 28214 4. Generator's Phone (Manifest Docume Generator's ID		
5 Transporter 1 Company Name 6 U.S. EPA ID Number 9 9	1 4 2		Transporter's ID porter's Phone)	320-5304 80123145
7 Transporter 2 Company Name 8. U.S. EPA ID Number			Transporter's ID	Charles Train	一切。在企業學院可能
	بسب		porter's Phone		
9 Designated Eacility Name and Site Address 10. U.S. EPA ID Number SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD	14.		Facility's ID		P. C.
SUMTER SC 29150 S_C_D_0_3_6_2_7_5	5,6,2,6		8	03-773	-1400
112 U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Cont No.	ainers Type	13. Total Quantity	14. Unit Wt/Vol	L Waste Number
RQ Waste Flammable Liquid, n.o.s., (contains acetone & oll) 3,UN-1993, PG-III (F001, F002, F003, D001)	002	DM	1,1,0	G	F001 F002 F003 D001
choloride) 3, UN-1993, PG III (F003, F002, D001)	001	DM	55	G	F003 F002
c RQ: Waste Flammable Liquid, n.o.s., (contains formaldehyde) 3, UN-1993, PG III. (F003, F005, D001)	001	DM	55	G	F003 F005
RCRA & DOT Non-Regulated, Non-Hazardous Material (contains	002	DM	1.1.0.	G	
	9 9 0 		ling Codes for Wa	10.4	
15 Special Handling Instructions and Additional Information Items A-C RQ is 100 lbs. State origin of waste is NC Work order #1782 24 hr emergency #1-800-424-9300 (CHEMTREC) 15 Special Handling Instructions and Additional Information STAT, Inc. Contact of Sparks 70-396-2304. Sparks 70-396-2304. 5PM call Garry 1-800-424-9300 (CHEMTREC)	Garry After	average: 3 minutes for for reviewing the form, suggestion Branch, Pl Washingto	R7 minutes for generate or treatment storage and ing instructions, gather Send comments rega ns for reducing this M-223, U.S. Environme on, D.C. 20460; and to the days of the storage of the on, D.C. 20460; and to the days of the storage of the days of days of	ors, 15 minuted disposal faing data, and inding the burden, to burden, to tall Protectione Office of Ir	information is estimated es for transporters, and cilities. This includes tin completing and reviewing under estimate, includin Chief, information Polition Agency, 401 M St., S.V. information and Regulato ashington; D.C. 20503.
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Printed/Typed Name Signature 17. Transporter 1 Acknowledgement of Receipt of Materials	Ma	uhi		M	onth Day Yea
Printed/Typed Name ROARK Signalure Lanny L.	Ra	nt	R .	M	onth Day Yea
18.: Transporter 2 Acknowledgement of Receipt of Materials			A SEC	da daga	रेड्फ कर ेड से (स्ट्री)
Printed/Typed Name: Signature				M	onth Day Yea
19. Discrepancy Indication Space		•	a[b[∐lbs. c	llbs.
20 Facility Output of Operator Cartification of receipt of hazardous materials operand by this manifest support	-11 1	15 10			To apply the State of the State

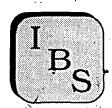
Signature

South Carolina Department of Health

2600 Bull Street, Columbia, SC 29201

Phone: (803) 734-5200

PLEASE PRINT or TYPE (Form designed to	r use on elite [12-pitch] typew	riter)	Form A	Emergency & Ho approved. OMB N		0039 Expires 9-30-
WASTEMANIFEST 1. Generator's U.S. EPA ID N C D 0 7 4 5 0		2, Pa		Information in	the sha	ded areas is not re- but is by State law
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Descriptions for Materials Listed Above		κ. 1 1	Handli	ing Codes for V	Vastes L	Sted Att.
State origin of waste is NC 8p Work order #1953	case of fire or splil of AT, Inc. Contact Gas arks 704-396-2304. A M call Garry 1-800-0 51.	After the	erage: 37 nutes for reviewing form. Se stions for I-223, U.S ton, D.C.	minutes for generato treatment storage an ginstructions, gather inductions regard reducing this burder 5. Environmental Prot 20460; and to the	rs, 15 minu d disposal ng data, an ing the burn n, to Chief, ection Ager Office of 1	Information is estimated tres for transporters, and facilities. This includes it do completing and reviewleen estimate, including as Information Policy Brannoy, 401 M St., S.W. Washington, D.C. 20503.
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Printed Typed Name Signature	Charle	1 +	2/	rellan	12.5°	Month Day Yea
17. Transporter 1 Acknowledgement of Receipt of Materials Property Printed/Type Name ROARK 18. Transporter 2 Acknowledgement of Receipt of Materials	Danny K	oar	l			Month "Day Yea
ি Printed/Typed Name : Signature						Month Day Yea
19. Discrepancy Indication Space				a	∐lbs., c	l lbs
20. Facility Owner or Operator; Certification of receipt of hazardous materials	covered by this manifest e	xcept as no	ted in	item 19.		



Industrial Brokerage Services, Inc.

P. O. Box 1263 / Lenoir, North Carolina 28645

INVOICE NUMBER	*** (1 ****)					
INVOICE	1: 12:12	•				

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DAMA COMUNISTRA TOTAL SATE BERGER RESIDE CHARLESTIT, NO 1860 1

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SHIPPED TO

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A MONTHLY SERVICE CHARGE ON ALL INDEBTEDNESS OUT-STANDING AFTER THE DUE DATE SHALL BE PAYABLE AT THE RATE OF PER MONTH. ANNUAL PERCENTAGE RATES ARE

Thank You

ALL ACCOUNTS DUE AND PAYABLE 30 DAYS FOLLOWING INVOICE DATE



June 28, 1994

Mr. Charley Ferrell

DANA CONTAINER

7254 Mount Holly Road

Charlotte, North Carolina 28214

Dear Mr. Ferrell:

On <u>June 6, 1994</u>, we received a waste shipment under Manifest Number <u>94003</u>, and the following discrepancies were noted for which corrective actions are required.

LINE C BLOCK I SHOULD INCLUDE WASTE NUMBER "U239" INSTEAD OF "U039".

LINE 11B SHOULD READ, "(RQ) WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S., 3, UN2924, PG III (D001) RQ (ALPHA NAPTHA)"
BLOCK I SHOULD HAVE "D002" AS THE WASTE NUMBER INSTEAD OF "D001" REFERENCE RVIDO-104"

The discrepancies and the corrective action have been noted on the manifest under Sections 19 (Discrepancy Indication Space). Your signature below constitutes approval of the above noted corrective action. Please keep one copy for your records and return the signed original to us. In addition the Customer Notification and Certification has also been corrected. A corrected copy of this document is provided for your records. Also, the profile RVIDO-104 is enclosed for your signature. Please sign and date the profile and the TC Rule Certification/Recertification form. Keep a copy for your records and return the original to us as soon as possible.

Thank you for your prompt attention to this matter. Laidlaw Environmental Services appreciates your business and hopes we may continue to serve your environmental management needs in the future.

GENERATOR AUTHORIZED SIGNATURE

Sincemely,

O CH

James Cedric Smith MATERIAL ROUTER

•	drum log	(corner)		Aw	MY
rum start date	-		UM number $\overline{\mathcal{I}_{i}}$	12 00002	
DENAMED ALCO			DANA) -Z TRAVS)	_20 gallons _21 gallon	۔ ک
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a long			total gallons		

UP TO 210 WHYD M 5000 200 n

- check for MANIFESTED WASTE.
- 2. if so attach a copy of MANIFEST.
- 3. check to see if listed waste are on TCLP.

MAJOR CONSTITUANTS, Bentatures ALECHOL, Motor O.C.

total gallons 53

drum start	date	28-93	DRUM number	
DENATO	URED ALCOHO	<u>12</u> .	(DANA)	55 gal.
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- check for MANIFESTED WASTE.
- if so attach a copy of MANIFEST.
 check to see if listed waste are on TCLP.

MAJOR CONSTITUANTS, DETNATURED ALCOHOL

TC Rule Certification/Recertification Form

:	, Day	. (i	O
		A Container Holly Rd	Cha Lall	· I E, N	E	PA I.D.#: <u>المُ د ٢٠٥</u> ٥	4505 850
Location			Charlot	18, 10	C 28211	•	
Waste D	escription:	uk citerrous		· · · · · · · · · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·
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СНАПА	CTERISTICS OF HAZ	ARDOUS WASTE: Indicat	e il this waste conta	ins any of	the following cha	racteristics based on	criteria mandated by
40 CFR	261.21, 261.22, 261.23	3 and 261.24.		•	-		
		Regulatory			(Che	ck One)	•
127		Threshold Level	(Check On	•	Scientific	Generator's	Actual Value
t::	•	CAAAI	Yes	No /	Data	Knowledge	Actual value
D001	Characteristic of	< 140°F		<u></u>			
DO02	Ignitability Characteristic of	≟ 2 or		V		/	рН
	Corrosivity	≥ 12.5		V		/	
0003	Characteristic of Reactivity	•					
	ricaciirity	•	-				
	•	*Regulatory	405 10-			k One)	A = 1 1 4 - 1
	Constituent	Threshold Level, ppm	(Check On Yes	No	Scientific Data	Generator's Knowledge	(bbw) Voins
DO04	(Arsenic)	5.0		V		v/	
0005	(Barium)	100.0		V		/	
D006	(Cadmium)	1.0		_/_		/	
D007	(Chromium)	5.0					
D008	(Lead)	5.0			,		
D009	(Mercury)	0.2		V			
DO10	(Selenium)	1.0		<u></u>			
DO11	(Silver)	5.0				· · · · · · · · · · · · · · · · · · ·	
DO12	Edrin	0.02		<u></u>			
DO13	Lindane	0.4		-/		-	
DO14	Methoxychlor	10.0		- V			
DO15	Toxaphene	0.5		V			<u></u>
DO16	2.4-D	10.0	. ————	. • •			
	124-Dichioro-						
0047	phenoxyacetic acid.)	1.0		V		/	•
DO17	2,4,5- TP Silvex	1,0					
DO18	Benzene	0.5	• .	V		✓	
DO19	Carbon	0.5		<u> </u>		/	
DO19	Tetrachloride	0.0					
DO20	Chlordane	0.03		\checkmark			
DO21	Chlorobenzene	100.0					
DO22		6.0		<u>/</u>			
DO23	o-Cresol	200.0		V			
DO24	m-Cresol	200.0		<u></u>			
DO24	p-Cresol	200.0		<u> </u>			
	F 01400.						

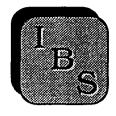
		* Regulatory	- (Check	(Check One) (C		ek One)		
50 % A	Constituent	Threshold Level, ppm	Yes	No	Scientific Data	Generator's Knowledge	Actual Value (ppm)	
DO26	Cresol.	200.0		V		V		
DO27	1,4-Dichlorobenzene	7.5	•					
DO28	1,2-Dichoroethane	0.5			·			
DO29	1,1-Dichloroethylene	0.7			-	·		
DQ30	2,4-Dinitrotoluene	0.13				./	•	
DO31	Heptachlor (and its epoxide)	800.0						
D032	Hexachlorobenzene	0.13			•	/		
DO33	Hexachlorobutadiene	0.5	•					
DO34	Hexachloroethane	3.0				/		
DO35	Methyl ethyl ketone	200.0	************					
DO36	Nitrobenzena	2.0		<u> </u>				
DO37	Peritachiorophenol	100.0		/				
DO38	Pyridine	5.0	 .	/				
- DO39	Tetrachiorethylene	0.7		<u>/</u>				
DO40	Trichlorethylene	0.5		√ .				
DQ41	2.4,5-Trichlorophenol	400.0						
DO42	2,4,6-Trichlorophenol	2.0						
DO43	Vinyl Chloride	0.2				V		
	e Oil Rebuttal:	arley	_ Fe	ene	been mixed part F, SC	with any had Date:	zardous was	
	D" Hazardous Wastes: Indicate ropriate hazardous waste code(s		ontains any lis	ned hazardol	us wastes coded in 40	CRF 261.31, 261.32 an	d 261.33 by including	
GENER	ATOR CERTIFICATION:		·	•			·	
	eby certifify that all information appleted, I authorize Southeaster							
Signatur	o: <u>Charl</u>	<u>z 7e</u>	ller	ाप	D.	ate:	94 WASH MGR	
Print Na	me: CHARL	EY FE	RREZ	(川	· Tī	tle: TANK	WASH MGR	

HAZARDOUS WASTE FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY GENERATOR INFORMATION; NAME Nana Container ADDRESS 7254 Mt Howy Road GITY Charlote STATE NC ZIP 28214 EPA WASTE NO. FOO3, FOOS, DOO! ACCUMULATION MANIFEST DOCUMENT NO. ACCUMULATION MANIFEST DOCUMENT NO. ACCUMULATION DOCUMENT NO. ACCUMULATION MANIFEST DOCU

Printed By: Lab Safety Supply Inc., Janesville WI 53547-1368

Reorder No. 43

IS 00001



Industrial Brokerage Services, Inc.

July 27, 1994

Mr. Chuck Ferrell DANA CONTAINER 7254 Mt. Holly Road Charlotte, NC 28214

Dear Chuck:

As per our conversation of July 26th, I am following through on the disposal of your formaldehyde. I have contacted Southeastern Chemical Co. (OMNI) and they have informed me that they have no record of the Authorization Request Forms being signed or submitted. I am resubmitting the forms back to you for your signature. Please sign at all high-lighted areas and forward them onto OMNI. When we receive the approvals on the waste stream, we will then contact you about shipping them.

Sincerely,

David L. Haynes, E.C.E.

DLH/ddg



Industrial Brokerage Services, Inc.

June 10, 1994

TO: CHUCK FERRELL

FROM: DEBBIE GIANNI

Chuck, I need you to make copies of this FAX and sign all the enclosed forms where I have marked with an asterik and send today to the following address:

SOUTHEASTERN CHEMICAL CO PO DRAWER 1755 SUMTER, SC 29151-1755

ATT; JOY ALEXANDER

I would appreciate it if you would also send us a copy of everything you signed so we can keep them for our files. I made a copy of how your Hazardous Waste label should be done. I will mail the rest of your streams down to you. As far as your methylene chloride is concerned, you still have time to work with that so I will go ahead and do the profile and mail that to you. If there are any more streams that you think you might have, go ahead and let us know now so that you won't be pushed for time. From start to finish, it usually takes 30 - 45 days to get approvals on these.

We will also be sending you the information you requested on GSX-Laidlaw at Reidsville, NC. As I explained, that is the facility which took your Alpha Naptha, Tetrahydrafuran and Methyl Ethyl Ketone drums. Southeastern Chemical Co. is not set up for caustic wastes.

If you have any further questions, give us a call.

PLEASE KUSH APPROVAL Sample Information Sheet

Sample to be Considered □ R&R Contact Chuck Ferrell Phone (704) 399-3395 Date__ Customer Name Daha Container Code _____ Address 7254 Mt. Holly Rd SEC Sample 1.D. #_____ State 12 Zio 28214 EPA I.D. # NC. D 074505850 Sample Description Brown Liquid Studge Sample Collected By Process Generating This Sample Newtor Clean out GENERAL CHARACTERISTICS CONTENTS (Attach MSDS or Information if possible) Color Brown 1 FormaldEhyde ☐ Liquid @ Solvents **图** Sludge Odor _____ ☐ Mild ☐ Solid Warte Gasoline ☑ Strong □ Powder Petroleum Oil ☐ None ANTICIPATED VOLUME HAZARDS (List any known or potential hazards associated with this sample) * Flammable _ Gals. Bulk ノーゴ Drums % Recovery _____ ☐ One Time ☐ Month Log-In Date _____ BTU ≥5,000 □ Week ☐ Year Sample Volume Received ___ Chlorine 2100 ppw1 M Other 3-6 mouth PH SPG % H₂₀ Color Physical Description Brown Studge 57 .99 **SISA** 0-5 Brown DIST 0/0 I.D. 1.D. CLASS 30-37 (T) F003 (2) 30-36 15-18 7005 1001 Results & Comments Please-send are bills & correspondence to: IBS, INC. P. O. BOX 1263 LENOIR NC 28645

Signed Charley Ferrell -14

Date 8-1-94

TC Rule Certification/Recertification Form

	λ.	- Couli			•		// en e e en
Genera	tor Name:	na Container	Charlotte	u Enc.	28214	EPA 1.D.#: <u>LICDO 7</u>	<u> </u>
Location		1+ Holly Rd		· // <u>C</u>	20217		· (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)
Waste D	escription:	rown Liquia -	Juago	· · · · · · · · · · · · · · · · · · ·	·	 	* - 10 128.0 Get
•			• 🙃				
		HAZARDOUS WASTE: Inc	dicate if this waste c	ontains any of	the fallowing ch	aracteristics based on	criteria manualed by
40 CFR	261.2], 261.22, 20	61.23 and 261.24.				•	
		Regulatory	•		•	eck One)	· · · · · · · · · · · · · · · · · · ·
	•	Threshold	(Check		Scientific	Generator's	A about Maha
		Level	Yes	No	Data	Knowledge	Actual Value
0001	Characteristic (of < 140°F					
D002	Ignitability Characteristic of		•	/	,	~	nH'
0002	Corrosivity			1/			
DO03	Characteristic of	of					
•	Reactivity				•		•
	•	*Regulatory			•	eck One)	
•	Constituent	Threshold	····· (Check Yes	One) No	Scientific Data	Generator's Knowledge	Actual Value
	Constituent	Level, ppm	162	NO	Data	Miowieage	(ppm)
DO04	(Arsenic)	5.0					
DO05	(Barium)	100.0					<u> </u>
D006	(Cadmium)	1.0		<u> </u>			<u> </u>
D007	(Chromium)	5.0					.
D008	(Lead)	5.0			<u>-</u>		
D009	(Mercury)	0.2 1.0	. +				
DO10	(Selenium)	5.0		 ·			
DO11	(Silver) Ednin	. 0.02		<u> </u>			
DO12	Lindane	0.4			,		
DO14	Methoxychlor	10.0				V	•
DO15	Toxaphene	0.5		. 7	•	/	
DO16	2,4-D	. 10.0					
	(2,4-Dichlaro-						
	phenoxyacetic a	cid.)	•	10 4. 3	•		
Q017	2,4,5-	1.0			······································		
•	TP Silvex	, · · · · · · · · · · · · · · · · · · ·				V	
DO18	Benzene	0.5					
DO19	Carbon .	0.5		· V			
	Tetrachloride		•	•		/	
DO20	Chlordane	. 0.03					CONTRACTOR OF THE PROPERTY OF
DO21	Chlorobenzene	100.0		<u> </u>			- Company of the Comp
DO22	Chloroform	6.0	 .	· — ·			10000000000000000000000000000000000000
DO23	o-Cresol	200.0	•		 		A STATE OF THE STA
DO24	m-Cresol	200.0					A SECOND
DO25	p-Cresol	200.0					Salan Baran Ba

٠٠٠ المجتملين		*Regulatory Threshold	(Check Yes	(One) No	(Che- Scientific Data	ck One) Generator's Knowledge	Actual Value
	Constituent	Level, ppm	162	/ /	· ·	Kilowiedge	
DO26	Cresol	200.0					7.00
DO27	1,4-	7.5					
	Dichlorobenzene		` <	V		V	jefed ∎
DO28	1,2-	0.5					· · · · · · · · · · · · · · · · · · ·
•	Dichlorobenzene			V		\checkmark	
DO29	1,1-	0.7					
	Dichlorobenzene	0.40		· v		. 🗸	·
DO30	2,4-	0.13	.'				-
	Dinitrotoluene			1.	•	/	
DO31	Heptachlor	800.0					-
	(and its hydroxide)				•		
DO32	Hexachioroben-	0.40		V		✓	**
	zene	0.13					1 4 1 1
DO33	Hexachlorobu-	0.5		シ゛.	•	✓	
500.	tadiene	0.5					
DO34	Hexachloro-	3.0		/		√	
D035	ethane	200.0				·	, , , , , ,
DO35	Methyl ethyl	200.0		 -,			100
DO36	ketone Nitrobenzene	2.0		/			***
DO37	Pentachlorophenol	100.0				V	
DO38	Pyridine	5.0		$\overline{}$		V	
DO39	Tetrachiorethylene	0.7				V	- ·
DO40	Trichlorethylene	0.5			•		
DO41	2,4,5-	400.0				1,	
5041	Trichlorophenol	,,,,,,					
DO42	2,4,6-	2.0			•.	√	
	Trichlorophenol	2.0				/	
DO43	Vinyl Chloride	0.2		✓		\checkmark	
20-70	thiji Omende	V-64					∮
				. ′			•

"LISTED" Hazardous Wastes: Indicate if this waste also contains any listed hazardous wastes coded in 40 CFR 261.31, 261.32 and 261.33 by including the appropriate EPA hazardous waste code (s).

F003	F005	· <u> </u>		
·			·	
		i		

GENERATOR CERTIFICATION:

I hereby certify that all information submitted on this form and all attached documents are true and accurate, in the event that	this form is not full	
I hereby certify that all information submitted on this form and all attached documents are true and accurate, in the event that completed, I authorize Southeastern Chemical Co. to conduct necessary testing at my expense to properly complete the form.		١,

Signature:	Charley Ferre	UII	Date: _	8-1-9	4
Print Name:	CHARLEY	FERREZL I	Title:	TANK WASI	4 MGRI
					1 200 6 6 6 5 6

Amendment	h Carolina Departm	ent of Health and Solid and Hazarda (803) 734-5200	Environmental Cont	Landfill rol Recycle Landform Other	☐ Reclaid ☐ Incinere ☐ Energy	
Authorization Numbersenerator Information	eri [] - [Nome Dana	Container	.	To be entered by TSD Facility		
Address 17254 Mt Holly Road	ni Name:	Telephone And SOUTHEASTERN CHI	70,41.13,9,91.1. ea Code EMICAL & SOLVENT (d • P.O. Drawer 106	3,3,9,5] [Zip Code	لىب
Line # (This line # will always represent the BROWN HRUND SLUDGE) Description of Hazardous Waste		eam)	Process Producing	Waste:	<u> </u>	
FOO3 FOO5 DOO1 FOOS EPA/DHEC Waste Codes	لنبا	DOT Hazard Class		wate Flammah maldehyde) 3,		
Inter Quarter for One-Time Disposal,/ Q Multiple Shipments Enter Frequency Here,, Physical State of Waste @ 70°F		Handling Meth Volume: (lbs.n) Flash Point (cc)	r. only)	Est.		
or DHEC Use Only, Note Received, Month, Date Year	·S:	1. \ N/A :	2. □ ◀ 60°F 3.	└ 60-140°F 4. \		
FC 1969 (Nev. 8/86)		•	•			Page 1

Authorization Request Form: (Continued) 11-03 Facility Use Only Packaging for Shipments In Drums (size) 55 920 In Bulk I V | Truck Specific Gravity, 1.99 Method of Transportation: Railroad tanker Viscosity @ 70° F. Low Wedium High Layering | None , Dilayered Multilayered Suspended Solids: % by weight or volume, Specify exact % 45 Dissolved Solids, by % weight, Specify exact % Organically Bound Sulfur (wt. %), Thousands of Diu's/lbs. Specify, ____ > 5,600 Organically Bound Chloride: Toxicity: High Medium Unknown Organically Bound Nitrogen (Wt %), Affinity for Water: Hydrophilic Lipophilic pH (if hydrophilic, 372) photos Visual Description of Waster Brown Leguid / Studge Constituents: List specific constituents by name and corresponding percentage in waste stream. Volatile Organics Salts & Inorganics Non-Volatile Organics -Acid or Alkalis isalvents: 13600 Formaldehyde METHYL ETHYL KETONE PEtroleum Oil 10/were 5-18 Gardine

- Wateri <u>05</u> %

YEC 1969 Rev. (8/86)

Authorization Request Form

-- (Continued)

Metallic: (total metals not EP Toxicity Test)

Pb..... <u>45.0</u> ppm

Zn.... <u>20.2</u> ppm

As <u>45.0</u> ppm, Cr+3 45.0 ppm Ba: ∠/000ppm Cr+5 . . . _ _ ppm Cd ∠/· 0 ppm

Hg <u>20.2</u>ppm Cu.... <u>20.2</u>ppm Se <u>∠ / . 0</u> ppm

Ag <u>250</u>ppm .<u>Fe</u>.... <u>202</u>ppm NI 20.2 ppm

Sb <u>20.2</u> ppm Ti <u>∠0.2</u>ppm Co <u>40.2</u> ppm _____ ppm

Toxics

Cyanide..... <u>450</u> ppm Pesticides..... <u>450</u> ppm Carcinogens <u>~50</u> ppm Other Toxics ... none born

Other Information. attached MSDS for formaldehyde

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Designature: Charley FERREZL III & TANK WASH MGR.

TSD Facility Certification:

I certify that based on the information presented in this document this facility is permitted to accept the waste stream described hereon, and do hereby Inform the generator listed hereon of acceptance of the waste for treatment, storage, and/or disposal in the manner designated, and in compliance with the ISD Facility's standard terms and conditions.

Signature: _

Date Submitted, _____

Print Name: _____

MATERIAL SAFETY DATA SHEET

GENIUM PUBLISHING CORPORATION 1145 CATALYN STREET SCHENECTADY, NY 12303-1836 USA (518) 377-8855



	390	
OΡ		

FORMAMIDE

Date September 1978

(516) 377-6633			III CORF.	Date	-рестое	
SECTION I. MATERIAL IDE	NTIFICATION					
MATERIAL NAME: FORMAMIDE	-13- 22004			-		
OTHER DESIGNATIONS: Methanar	•			•		
MANUFACTURER: E.I. duPont do Wilmington, D	•	nc.				
withingcon, D,		ephone: (302	:)774-7500)		•
	· · · · · · · · · · · · · · · · · · ·	F	·			
SECTION II. INGREDIENTS	AND HAZARDS		×	IHA	ZARD D	ATA
Formamide	•	, '	ca 100			
Ammonia			Traces	B-hr TW	A 50 pp	m
						•
		i		ŀ		
1	y week with					
* ACGIH (1977) TLV.	en e				oral LD: O mg/kg	
				/30	o may ka	
SECTION III. PHYSICAL D	ATA				·· ··· ····	
Boiling point at 1 atm, deg (Specific grav	i++- 20/4	<u> </u>		12
(partially decomposes abo		Evaporation r				
Vapor pressure, mm Hg, at 70	.5 C 1.0	Melting point	, deg C -		2	.55
1 · · · · · · · · · · · · · · · · · · ·		olecular wei	ght —		4	5.04
Vapor density (Air=1) Water solubility		• •			•	
Appearance & Odor: A clear,	•	ronic liquid :	which is	moderat	elv visc	cous
at room temperature. It	may have a faint o	dor of ammon	ia.			
SECTION IV. FIRE AND EX					LOWER	UPPER
Flash Point and Method A	utoignition Temp.	Flammability	Limits	In Air	1	•
	-1" for ond water					
Extinguishing media: "Alcoho This combustible material is		zard when he	ated. It	has no	unusua:	l fire
or explosion hazards.						
Firefighters should use self-	-contained breathir	ng apparatus v	when figh	ting fi	res invo	olving
formamide.	•					•
SECTION V. REACTIVITY D	ATA		· ·			
Formamide is a stable materia						It
undergoes thermal decomposi		 _				
Copper and brass are attacked steel. Aluminum or stainle	· · · · · · · · · · · · · · · · · · ·					
Sceet. Attention of Stainte	cas aceel concainer	.s. sucutu be i	nsed for	SHIPPIN	y or see	raye.
 	·	1				

SECTION VI. HEALTH HAZARD INFORMATION

TLV 20 ppm or 30 mg/m 3

Excessive inhalation of vapors can cause symptoms varying from headache, irritation and nausea to loss of consciousness, depending on concentration and time of exposure.

Eye contact with liquid is irritating and can be damaging. Skin contact is irritating and absorption through the skin can be harmful. Do not ingest!

FIRST AID:

Eye contact: Flush well with plenty of running water, including under eyelids, for at least 15 minutes. Contact a physician promptly.

Skin contact: Promptly remove contaminated clothing and wash exposed skin areas thoroughly with water for at least 15 minutes. Contact physician if large areas of skin have been exposed or if irritation persists.

<u>Inhalation</u>: Remove to fresh air. Restore breathing if necessary. Call physician. Ingestion: Call physician.

SECTION VII. SPILL, LEAK, AND DISPOSAL PROCEDURES

Provide ventilation. Exclude persons not involved in clean up. Protection against liquid contact or vapor inhalation must be used by those involved in clean up. Contain spill. Small amounts and residues can be flushed to the sewer with plenty of water. Larger spills should be picked up under direction of safety personnel. Use absorbent solids such as vermiculite or dry sand to collect liquid; scoop up and place in container for disposal.

Disposal - Follow Federal, State, and local regulations. Waste formamide can be burned in an approved incinerator with a scrubber to remove acidic nitrogen compounds from effluents, or it can be disposed of via a licensed waste disposal company.

SECTION VIII. SPECIAL PROTECTION INFORMATION

Provide adequate general ventilation and local exhaust ventilation to meet TIV requirements. Where material is heated or misted, local exhaust ventilation (at least 100 lfm face velocity) must be used. An approved respirator with organic vapor canister should be available for emergency and non-routine use above the TLV.

Use neoprene gloves and safety glasses for protection against liquid contact. Depending on conditions of use, a face shield and protective clothing may also be needed where splashing is probable.

An eyewash station and safety shower should be located in areas of use.

SECTION IX. SPECIAL PRECAUTIONS AND COMMENTS

Store in a cool, dry place in tightly closed containers. (See Sect. V) The supplier directs not to wash out drums after use or to use them for other purposes.

Avoid contact with liquid. Avoid inhalation of mist.or..vapors.

Formamide has been listed as a "suggestive" Teratogen. This possible hazard should be
discussed with all employees exposed to it who may become pregnant.

DATA SOURCE(S) CODE:1, 2, 4-8.

Judgments as to the suitability of information herein for purchaser's purposes are necessarily purchaser's responsibility. Therefore, although reasonable care has been taken in the preparation of such information, Genium Publishing Corporation extends no warranties, makes no representations and assumes no responsibility as to the accuracy or suitability of such information for application to purchaser's intended purposes or for consequences of its use.

APPROVALS: MIS,

Industrial Hygiene and Safety

Corporate Medical

Staff

George T. marteton mo

FN	ERGY F	MANIFEST RECOVERY RESOUR	CES. INC.		MANIFEST N	СМВЕЯ	
		PART I — TO BE CO		NERATOR	-		
COMPANY NA	AN	Sansforta	200		IDENTIFICATION	ON NUMBER	
ADDRESS WH	RE SHIPMENT	DRIGINATES		╽┖┸┸┸			Ш
	DAD	II — WORK CONTRACTE	ID BY	FACILITY PHONE	NUMBER		
CONTRACTOR		II - WORK CONTRACTE	1001	()			
ADDRESS							
				-			
_		OF OTHER DESIGNATION.					
RECEIVER'S N		DESTINATION A DESCUIDED AND					
BUSINESS AD	PAESS	RESOURCES, INC.		1 1 7 7	IDENTIFICATION	1111	
P.O. Box	651 SITE) ADDRESS	Zip 28225			D 0 4 8	4 6 1 3	<u>'</u> ["
210 Dalto				FACILITY PHONE	NUMBER		
Charlotte,	N.C.			(704)	33	2-8692	
NO I			TE DESCRIPTION				
NO. CONT. TYP	E CONT. (2)	DOT. PROPER SHIPPING NAME (3)	DESCRIPTION (4)	c	LASS (5)	AMOUNT (6)	UNI (7
	П	USED OIL				410	20
						120	77
_					-		╁
	-+						\vdash
			<u> </u>				
MARKED,	LABELED A	THAT THE ABOVE NAMED MAT AND AREIN PROPER CONDITION	ON FOR TRANSPORTA	ATION ACCO			
		HE DEPARTMENT OF TRANSPO	RTATION AND THE EPA	A			
) o	M	JULY V	DATE OF SHIPMENT	мо	/ DA	y / YE	AR
	0_	PART III — TO BE CO					
TRANSPORTE ADDRESS	P.0	ergy Recovery Resources, Inc. D. Box 5651, Charlotte, NC 282		 	D 0 4 8	4 6 1 3	,,,
PHONE NUMB	·	4) 332-8692			<u> </u>	1111	Ш
		orm des not in any way, replace ported waste is a hazendous was		hazardous w	aste manife	est, which m	ust b
	AUTHO-ZEO		DATE	1	7. 1	7.2	·
SIGNATURE	~~		<u></u>		/ OA	v / 🔽	AR

HAZARDOUS WASTE

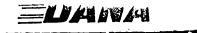
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

SHIPPING NAME FLAM	MABLE WASTE LIQUIDN OR NA NO. 1993
GENERATOR INFORMATION DANA	on Container
	MT. HOLLY RJ PHONE (704) 399-3395
EPA ID. NO. NCDO 7450 ACCUMULATION 3/2	05850 EPA WASTE NO. DOS
SIANI DAIE	AZARDOUS OR TOXIC WASTES
PROPER SHIPPING NAME TECHNICAL CHEMICAL NAME	
UN OR NA ID. NO. D.O.T. PROPER	SHIPPING NAME AND UN OR NA HO, WITH PREFIX PARETEE PARETE

Hertage?

Clace Halbor



CONTAINER LOG

PAGE __ OF __:

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LOCATION	: CHARLOTTE, NO					
DOT SHIP	PING NAME:		·			
TWO MAIN	CONSTITUENTS:	•	&			
иои-н	AZARDOUS	HAZARDOUS	D001	TCLP		LISTED WAST
ACCUMULA'	TION START DATE	·				
CONTAINE	R NUMBER:					
' NATE I	JODY ODDED #				5 ′′	G.1.3116
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COMMENTS	:	<u> </u>				

the total solution.

August 11, 1994

PHONE: 704-399-3395

Dana Container 7254 Mt Holly Road Charlotte NC 28214

ATTN:

Chuck Ferrell

FROM:

Joy Alexander

RE:

WASTE PROFILE NUMBER:

Stream SE-A2071-6990

Your Authorization Request Form has been submitted for you to SCDHEC on August 9, 1994. Unless there are questions, the legal date for first pickup will be August 26, 1994.

A copy of your ARF and a S.C. Manifest are enclosed so that you may familarize yourself with them. We will originate the manifest for you whenever a pickup is scheduled unless you prefer otherwise. Please let us know if this is the case.

LAND DISPOSAL RESTRICTION CERTIFICATION

A Land Disposal Restriction Certification (2 pages) must accompany each shipment of hazardous waste. A form is enclosed which is suitable for your use. This certification must have an original signature and filling it out is the generator's responsibility. On the second page of your ARF in the lower left-hand corner, you will find a breakdown of your waste. If your waste stays basically the same, you can use this as a guideline to fill out the checklist. Please retain a copy with each shipment of your waste for your records as it is required by inspectors.

DOT SHIPPING CODE:

Waste Flammable Liquid N.O.S. 3 UN1993 III

Contains Formaldehyde

The above underlined DOT shipping code has been assigned to the your waste profile number. It is an important item that should be reviewed prior to first shipment.

Please review the Authorization Request Form carefully as any subsequent changes made (contact person, DOT/EPA waste codes, etc.) will entail an amendment process with the State of South Carolina. You will be contacted by our office to schedule a pick-up of your waste stream around the legal date. If you have any questions, please do not hesitate to contact us. We appreciate your business and look forward to working with you.

Southeastern Chemical Co. 755 Industrial Road PO Box 1060 Sumter, SC 29151 803-773-1400 FAX: 803-775-7016 Toll Free: 800-872-7002

HAZARDOUS WASTE

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION;

NAME Jana Container

ADDRESS 7254 mt Howy Koad

GIJY CREVIOTE STATE NC ZIP 28214

EPA NCD 074505850 EPA WASTE NO. F003 F005, D001

ACCUMULATION MANIFEST DOCUMENT NO

(contains formaldehigde) 3, UN-1993

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

Printed By: Lab Safety Supply Inc., Janesville WI 53547-1369

Reorder No. 43

IS 00001



Dana Container 7254 Mt Holly Road Charlotte NC 28214

August 11, 1994

Chuck Ferrell: Dear

Hazardous Waste Stream No. RE: SE-A2071-6990

When transporting and treating hazardous waste materials, safety and compliance with applicable regulation are OMNI's greatest considerations.

Following is an OMNI policy in regard to transportaion and treatment of the above mentioned hazardous waste generated by your facility. Please note this waste requires special handling.

I. PACKAGING

- Physical Condition of Drums
 - 1. All drums should be in good physical condition, properly sealed, and be in open top 17H or closed top 17-E drums to meet D.O.T. specifications for material contained.
 - There shall be no holes or serious dents. 2.
 - 3. Plastic, poly-lined or fiber cannot be used.
 - 4. Lids, bungs or any opening should be closed securely to prevent spillage. Leaky container(s) will not be accepted by Southeastern Chemical & Solvent Company.

II. CONTAINER CLOSURES

- 1. All closed top drums should have 2 1/2" bungs on the top to facilitate inspection of its contents.
- 2. Openhead drums must be accurately fastened using 5/8"

 HEAVY GAUGE bolted cinch rings. Lever Locked drums

 will not be accepted.

III. LABELING

- A. 1. Special code assigned to this stream <u>must</u> be stenciled on the lid as well as on the containers with minimum 1" letters/numbers.
 - The attached form should be entirely completed and accompany manifest with the load.
 - 3. Each drum must always have the proper hazard 4"X 4" label (Flammable Liquid, Corrosive, ORM-A, Poison, etc.) clearly displayed on its side.
 - Any stenciling or other extraneous markings that could be conflicting or distracting must be painted or covered over completely.
 - Southeastern Chemical & Solvent Company should be notified 10 days prion to shipment.

B. MARKING LABELING

- All drums must be marked according to DOT and/or EPA and state government regulations.
- 2. Marking labels must be durable and displayed clearly on the side of the drum.
- 3. Marking labels must contain all of the following information.
 - a. Proper shipping name.
 - b. Generator's name and address.
 - c. EPA hazardous materials disposal statement.
 - d. Waste Manifest number.
 - e. Accumulation start date.

Marking Labeling Cont'd

- 4. Each drum must have clearly printed on the top and upper third of the drum, the OMNI profile number assigned to that particular waste.
- 5. Each drum must indicate on the top if contents are <u>liquid</u>, <u>sludge</u> <u>or solid</u>.

When drums are stored exposed to the weather or stored for extended periods of time, labels can fade or peel from them. Should these problems arise, faded, damaged, or missing labels must be replaced prior to offer for transport.

The process of inspection and labeling can be time consuming, but OMNI wishes to re-emphasize that the safety and the integrity of both the shipper and transporter are involved. Therefore, strict adherence to these requirements should make demurrage charges unnecessary and will prevent our driver's rejecting your load. Such rejection will result in the billing of regular freight charges.

We are always willing to help you comply with these drum acceptance requirements. If you ever have any questions or problems, please do not hesitate to contact us at (803) 773-1400.

Thank you for your business.

Harshad Desai

menoment in the way	Authorization Request Form Landfill Reclaim Reclaim Reclaim Landfill Recycle Incinerate Landfarm Energy/Recovery Company Other Other Company Company
Generalar information.	SE - [A.2071] - [6990 or To be entered by TSD Facility Dana Container
Address 7254 M+ Holly Road Chuck Ferrell Official Contact Title	City CHARLOTTE State NC Zip Code 28214
Treatment, Storage, or Disposal Facility Information: Facility EPA IUD # [S.C.D.O.3.6,2,7,5,6,2,6]	SC County (For In-state Generator Only) SOUTHEASTERN CHEMICAL & SOLVENT COMPANY
BROWN LIQUED SLUDGE	pecific waste stream)
FOO3 FOO5 DOOL EPA/DHEC Waste Codes	Process Producing Waster Tark Clearing DOT Code: RQ, Waste Flammable Lighted, 10.0.5. (Contained Formaldehyde) 3, Cul-1993 PGTTT.
Enter Quarter for One-Time Disposal,/Qtr./Yt If Multiple Shipments Enter Frequency Here,/ Physical State of Waste @ 70°F 1 solid 2 liquid 3 N/A	
For DHEC Use Only: Date Received: Month Date Year DHEC 1969 (Nov. 6/86)	Poge 1

Authorization Request Form (Continued) Facility Use Only Packaging for Shipment, In Drums (size) 55 9ac Specific Gravity, [.99] Method of Transportation: Railroad tanker Truck Other Viscosity @ 70° F. Low Medium High Layering None Dilayered Multilayered Suspended Solids: % by weight or volume, Specify exact % [45] Dissolved Solids, by % weight, Specify exact % [25] Organically Bound Sulfur (wt. %), 6 Organically Bound Chloride, 6 Thousands of Div's/lbs. Specify, ____ >5,000 Toxicity: High Medium Wilnisnown Organically Bound Nitrogen (Wt %), Ash %1 4 Affinity for Water: Hydrophilic Lipophilic pH (if hydrophilic, 3-2) Visual Description of Waster Brown Light af Studges Constituents: List specific constituents by name and corresponding percentage in waste stream. Volatile Organics Salts & Inorganics Non-Volatile Organics Acid or Alkalis Nolverts: 13036 Formaldehyde METRY Ethyl Ketone PEtroleum Oil Where 15-18 Gasoline

Water 05 %

THEC 1969 Rev. (8/86)

Page 2

Authorization Request Form

(Continued)

cilici (total metals not EP Toxicity Test)

25.0 ppm,

Ba:....∠/000ppm

Cd 21.0 ppm

Pb.... <u><5.0</u> ppm

Zn.... <u>20.2</u> ppm

Cr+3 <u>450 ppm</u> Ag <u>450 ppm</u> 5b <u>20.2</u>ppm Cr+5 ___ ppm NI <u>20.2</u>ppm Hg <u>∠ 0.2</u>ppm

Cu..... <u>∠o.</u>2_{ppm}

Cyonide..... <u>450</u> ppm Pesticides <u>~50</u> ppm Carcinogens 450 ppm

Other Toxics Mc ppm

Other Information, attached MSDS for formaldehyde

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, occurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Designatures CHARLEY FERREZL III & TANK WASH MGR.

Toxics

TSD Facility Certification:

I certify that based on the information presented in this document this facility is permitted to accept the waste stream described hereon, and do hereby Inform the generator listed hereon of acceptance of the waste for treatment, storage, and/or disposal in the manner designated, and in compliance with the TSD Facility's standard terms and conditions.

____ Date Submittedi _

Print Name: DON AL

DHEC 1969 Rev. [8/86]

Page 3

P.O. BOX 703 NKTRO, WV 25143 FAX # (304) 755-3800 FAX # (304) 755-3902 COVER SHEET 19: Apr 11:00 FRM: Jahran DATE: 5 6 Treep Him and Broad





NCD074505850

State of North Carolina

Department of Environment, Health, and Natural Resources

512 North Salisbury Street • Raleigh, North Carolina 27604

Division of Solid Waste Management

James B. Hunt, Jr., Governor

Telephone 919-733-2178

Jonathan B. Howes, Secretary

6-4-93

Dava Corp

REFERENCE: Change in RCRA Classification and Site Information Forms

Dear Sir/Madam:

Enclosed is a copy of the Notification of Hazardous Waste Activity Form (8700-12) and an instruction booklet. Completion of this form is required to make changes for the facility RCRA status; revise company information; waste codes; company name; owner and operator, and to request a new EPA Identification Number.

All EPA Identification numbers are site specific. The ID number remains with the site as long as it exist. If you should sell the facility, the ID number should be transferred to the new occupant(s). If you move to a new location that does not have an existing number, you will need to obtain an ID number for your new location. Also, include your SIC Code number or describe your business activity(ies) in the comment section.

If you have any questions on completion of this form, please contact Jim Edwards at (919) 733-2178.

Sincerely,

R.J. Edwards Administrative Officer

Waste Management Branch Hazardous Waste Section

RJE [FORM1.RJE]

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Will that chart guillate to Vaste Activity/Mark X in the appropriate boxe	s. Referio histracions)
A Lieu a Gole Waste Activity	Business Company of the Company of t
ce Batty (See Itstructions) 21 13 Treater, Storer, Disposer Note: A permit is required	I for the state of
The activity see instruction of the control of the	or cine Macens.
a. Generator Marketing	to Burner O. Burner singlests de Types of Complete Comple
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Type of Combustion Mode gara organisms Utility Boller	Devices 20 jpt 2
2. Industrial Bolid	
3. Industrial Furn	
U 4 Water 5 Other - specify	
X. Description of Regulated Wastes (Use additional sheets if necessar)	
A. Characteristics of Nonlisted Hazardous Wastes. Mark X' in the boxes corres	
wastes your installation handles: (See 40 CFR Parts 261.20 - 261.24) 1. Ignitable 2: Corrosive 33 Reactive 4: Toxicity	
(DOAT) Was (DOAT) State of the content of the conte	EPA házardolis wäste nume (1757)
	Characteristic contaminant(s)
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	0 3 10
C. Ohi (NV) iii (S. A. A. C. Callyroleic I.D. number. See instructions	
X Confidence (
I certify under penalty of law that I have personally examined and an and all attached documents, and that based on my inquiry of the	n familiar with the information submitted in this
obtaining the information, I believe that the submitted information that there are significant penalties for submitting false information.	is true, accurate, and complete. I am aware
Imprisonment.	ation, including the possibility of fines and
Signature Name and Official Title (type or p	orint) Date Signed
XI. Comments	
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SERVICE THE CONTRACTOR OF THE	

Form Approved. OMB No. 2050-0028. Expires 10-31-91 GSA No. 0248-FPA-01

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

Date Received (For Official Use Only)

and Recovery Act).	United States Environment	ntal Protection Agency	
I. Installation's EPA ID Number (Mark 'X' in the appropriate box)	····	
A. First Notification	B. Subsequent Notification (complete item C)	C. Installation's EP	0 5 8 5 0
II. Name of Installation (Include c	company and specific site name)	
III. Location of installation (Physi Street	cal address not P.O. Box or Rou	ute Number)	
Street (continued)		, , , , , , , , , , , , , , , , , , ,	
City or Town		State ZIP Code	
			-
County Code County Name			
IV. Installation Mailing Address (See Instructions		
Street or P.O. Box			0
Silect Of F.O. BUX			
City or Town		State ZIP Code	
V. Installation Contact (Person to	be contacted regarding waste i	activities at site)	
Name (last)	(fir	st)	
Job Title	Pf	hone Number (area code and number)	
		<u> </u>	•
VI. Installation Contact Address (
Contact Address B. Street or P	,.O. BOX		
Object To	1 1 1 1 1 1		
City or Town		State ZIP Code	<u> </u>
VII. Ownership (See Instructions)			- ;
A. Name of Installation's Legal O	M		9
Street, P.O. Box, or Route Numb	er	1-	_1_1_1_1_1_
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The total solution.

Generator Name:
Address:
E.P.A. I.D. Number:
Hazardous Waste I.D. Number: SE A
(1) Date of last shipment: Month Date Year
(2) Manifest Number:
(3) Has there been any change in the profile of the stream
since last shipment? Yes No
(4) If yes, please explain and give complete profile of stream
components:
Attached Hazard Hazard M.S.D.S. Class Rating

8
100 %
(5) Attach M.S.D.S.'s of all chemicals listed above in (4).
(6) Please list any suggestions, comments etc. here:
GIGNATURE TITLE DATE
Generator

A unique feature associated with these changes is a series of "transition dates" DOT has established for mandatory compliance with the new standards. The following chart illustrates this:

Compliance Date	Material		New DOT Shipping Standards						
		CL	SP	MK	LB	PL	PK	SG	
10/1/91	New explosive	х	х	Х	х				
10/1/91	PIH (1)	х	(2)						
10/1/92	PIH	х	х	х	х	Х			
10/1/93	PIH						х	X	
10/1/93	All hazards, except Division 6.2	х	х	х	х			х	
01/1/94	Infectious substances	х	х	х	х		х		
10/1/94	All hazards					Х	(3)		
10/1/96	All hazards						Х		
10/1/2001	All hazards					(4)	(5)		

CL=Classification, SP=Shipping Paper, MK=Marking, LB=Labeling, PL=Placarding, PK=Packaging, SG=Segregation Chart

- (1) PIH=Poison-Inhalation Hazard
- (2) Partial compliance only, additional PIH description
- (3) Manufacture of non-bulk DOT specification packages no longer authorized, except for cylinders and radioactive material packing
- (4) Compliance with new placard designs
- (5) Packages filled before 10/91 can be reshipped until this date.

The purpose of this compliance alert is to remind you, our valued customer that the new DOT regulatory standards encompassed under HM181 will become MANDATORY as of October 1, 1993, at which time all companies are expected to reflect these new standards in their manifests, package markings and labelings, and load segregation decisions for all DOT Hazardous materials/wastes. Shipping Poison-Inhalation Hazard (PIH) material, will also necessitate compliance with new standards for vehicle placarding and UN standard packaging. If you need assistance at any point in the process, please do not hesitate to contact one of our service representatives.



COMPLIANCE ALERT

SUMMARY OF CHANGES TO THE HAZARDOUS MATERIAL REGULATIONS

The U.S. Department of Transportation (DOT) has adopted substantive revisions to its Hazardous Material Regulations (HMR) in Title 49, Code of Federal Regulations, Parts 100-199. These changes reflect substantial differences in the way we classify, describe, package and transport hazardous materials/wastes pursuant to DOT regulation. For instance, DOT has replaced its system of named hazards with the United Nations' numerical classification systems as follows:

Class or Division No.	Class Name	Class or Division No.	Class Name
1	Explosives (six divisions)	5.1	Oxidizer
2.1	Flammable gas	5.2	Organic Peroxide
2.2	Nonflammable gas	· 6.1	Poisonous material
2.3	Poisonous gas	6.2	Infectious substances
3	Flammable liquid	7	Radioactive materials
4.1	Flammable solid	8	Corrosive material
4.2	Spontaneously Combustible	9	Miscellaneous hazardous materials
4.3	Dangerous when wet	None	ORM-D; Combustible liquid

The following examples illustrate some of the changes in DOT descriptions:

Proper shipping name	Class No.	ID No.	Packing Group
Hazardous waste solid, n.o.s.	9	NA 3077	III
Waste Acetone	3	UN 1090	п

The Packing Group information is completely new to the DOT description requirements. It communicates the "degree" of hazard (I = highest) and directs the type of package that must be used.

Other changes to the HMR include:

- a) the Hazardous Material Table, particularly the addition of Columns 5 (Packing Groups and 7 (Special Provisions);
- b) marking requirements for bulk/non-bulk packages, inhalation hazard, liquid hazardous material;
- c) labeling requirements, particularly subsidiary hazard labeling and optional label information;
- d) placarding requirements, except for delayed compliance with newer placard designs;
- e) shift from DOT specification packaging to a system of performance-oriented packaging;
- f) segregation/separation chart limits or prohibits hazard combinations based on either the primary or subsidiary hazard, whichever is more restrictive.

over



the recel colution.

November 23, 1993

PHONE: 704-399-3395

Dana Container
7254 Mount Holly Road
Charlotte NC 28214

ATTN: Char FROM: Joy

Charley Ferrell Joy Alexander

RE:

WASTE PROFILE NUMBER:

Stream_SE-14420-F003

Your Authorization Request Form has been submitted for you to SCDHEC on November 15, 1993. Unless there are questions, the legal date for first pickup will be November 30, 1993.

A copy of your ARF and a S.C. Manifest are enclosed so that you may familarize yourself with them. We will originate the manifest for you whenever a pickup is scheduled unless you prefer otherwise. Please let us know if this is the case.

LAND DISPOSAL RESTRICTION CERTIFICATION

A Land Disposal Restriction Certification (2 pages) must accompany each shipment of hazardous waste. A form is enclosed which is suitable for your use. This certification must have an original signature and filling it out is the generator's responsibility. On the second page of your ARF in the lower left-hand corner, you will find a breakdown of your waste. If your waste stays basically the same, you can use this as a guideline to fill out the checklist. Please retain a copy with each shipment of your waste for your records as it is required by inspectors.

DOT SHIPPING CODE:

Waste Flammable Liquid N.O.S. 3 UN1993 III Contains Ethyl Acetate & Methanol

The above underlined DOT shipping code has been assigned to the your waste profile number. It is an important item that should be reviewed prior to first shipment.

Please review the Authorization Request Form carefully as any subsequent changes made (contact person, DOT/EPA waste codes, etc.) will entail an amendment process with the State of South Carolina. You will be contacted by our office to schedule a pick-up of your waste stream around the legal date. If you have any questions, please do not hesitate to contact us. We appreciate your business and look forward to working with you.

TOP+ MSDS-Octached Authorization Request Form South Carolina Department of Health and Environmental Control Bureau of Solld and Hazardous Waste Bureau of Solld and Hazardous Waste CECEIVED OCT 2 5 1990 P 2007/ (803) 734-5200 Other	<i>\</i>
Authorization Number: SE - 1.4.4.20 - Fao3 To be entered by TSD Facility Generator ID # [NC.) 074505850] Name DANA, CONTAINER	18 ₅
Address 7,254, Mt, H,C,L,Y, RCA) Official Contact CHARLEY FERRELL Title CAMPURANCE MGR. Telephone 704,399,395 Treatment, Storage, or Disposal Facility Information: Facility EPA IUD # S,C,D,0,3,6,2,7,5,6,2,6 Name: SOUTHEASTERN CHEMICAL & SOLVENT COMPANY 755 Industrial Road • P.O. Drawer 1060 Sumter, SC 29151	. لــــــا .
Line # (This line # will always represent this specific waste stream) C.C.E.H.R. L.I.Q.U.L.D. Description of Hazardous Waste Frocess Producing Waster Tank. Cleaning DOT Code, RQ, Waster Flammable, Liquid, (Centain & Ethyl Acetate, methanel) 3, Unit	7)·0·5., U-1993,
Enter Quarter for One-Time Disposal, 4/9.3 Qtr./Yr. If Multiple Shipments Enter Frequency Here:times/yr. Physical State of Waste @ 70°F 1 solid 2 liquid 3 N/A Handling Method,	
For DHEC Use Only: Notes: Month Date Year	

The second of th

Authorization Request Form (Continued)

Facility Use Only,			 	·		·
	· · · · · · · · · · · · · · · · · · ·					
Packaging for Shipment, In C	rums (size) 55 GAL	In I	Dulk L Other	-		
Method of Transportation:	ailroad tanker		Otheri	Specific	Gravity: 0.8	•
Viscosity @ 70° F. Low	Medium High	Layering	None .	Dilayered	Multilayered	
Suspended Sollds: % by weight or	volume, Specify exact % 🖆	Dissolve	; d Solids, by % weight, S	Specify exact 9	/o LO	
Thousands of Bru's/lbs. Specify,	≤870 /0,000	Organic	ally Bound Sulfur (wt. %), [(0.1]	Organically Bound Ch	loride, 🚄
Organically Bound Nitrogen (Wt %)	. (<0.)	Toxicity	High High	edium 🔀	FUnknown A	Ash %, \(\)
Affinity for Water: Hydrophilic	Lipophilic pH (if hyd	Irophilic, 5	- 7]			
Visual Description of Waster	LAR CIOUID				٧,	
Constituents, List specific constituent	s by name and corresponding pe	rcentage in	waste stream.		· ·	
Volatile Organics %	Non-Volatile Organics	%	Acid or Alkalis	% 	Salts & Inorganics	%
METHANOC 30-40	PETROJEUM SOLVENT	< 5				
NIETHY ISOBUTY (KEYME)-5	HEXYLENE GlyCOL	15		··		
ETHYL ACETHTE 25-35						
ETHANOL 10-15		_				
		_				
Water 0-5 %	• • • • • • • • • • • • • • • • • • • •			·.'		<u>-</u> -

DHEC 1969 Rev. (8/86)

Authorization Request Form

	(Continued)	•,	. •
Metallic: (total metals not EP Toxicity Test)		<u>.</u> :	Toxics:
Ba $\angle 100.0$ ppm $Cr+5$ $\underline{Cr+5}$ Cd $\angle 1.0$ ppm $\underline{Cr+5}$ Hg $\underline{C0.2}$ ppm $\underline{Cr+5}$ Se $\underline{C1.0}$ ppm $\underline{Cr+5}$ Se $\underline{C1.0}$ ppm	ppm :Ni <u>CO.2</u> ppm ppm :Cu <u>CO.2</u> ppm ppm TI <u>CO.2</u> ppm	Fe <u>LO.Z</u> ppm Sb <u>LO.Z</u> ppm Mn <u>LO.Z</u> ppm Co <u>LO.Z</u> ppm ppm	Cyanide
Other Information:		· · · · · · · · · · · · · · · · · · ·	
ther information:			
Certification:	:		
	Leppm Cr+3 (5.0) ppm Ag (5.0) ppm Fe (2.2) ppm Pesticides (50)		
		e, and/or disposal in the mann	
Print Name: DONA/d F	Fitch	Title. LAS DI	recon

dine recolessibilities

Industrial Brokerage 1-704-396-2308 Charles Foushee

June 13, 1994

704-399-3395 PHONE:

Dana Container 7254 Mt Holly Road Charlotte NC 28214

ATTN: FROM:

Chuck Ferrell

- MANCY Coleman

RE:

WASTE PROFILE NUMBER: Stream SE-16141-7777

Your Authorization Request Form has been submitted for you to SCDHEC on June 8, 1994.

A copy of your ARF, and a copy of a S.C. Manifest are enclosed so that you may familiarize yourself with them. We will originate the manifest for you whenever a pickup is scheduled unless you prefer otherwise. Please let us know if this is the case.

DOT SHIPPING CODE: Non-Regulated

The above underlined DOT shipping code has been assigned to your waste profile number. It is an important item that should be reviewed prior to first shipment.

Please review the Authorization Request Form carefully as any subsequent changes made (contact person, DOT/EPA waste codes, etc.) will entail an amendment process with the State of South Carolina. You will be contacted by our office to schedule a pick-up of your waste stream in the near future.

If you have any questions, please do not hesitate to contact us. We appreciate your business and look forward to working with you.

South Card	Authorization Requipment of Health and Dureau of Solld and Hazardo (803) 734-5200	Environmental Control	☐ Recloim ☐ Incinerate ☐ Energy/Recovery
	DANA CONTAIN City CH ITALE MORY. Telephone L Name: SOUTHEASTERN CHI 755 Industrial Road	ER. State (N.C.) 5101e (N.C.)	/B5
Line # (This line # will always represent this spe NON - HAZARDOUS MATERIAL — Dari Description of Hazardous Waste 7.7.7.7	· · · · · · · · · · · · · · · · · · ·	Process Producing Waster Tank Clean Out DOT Code: RCRA & NOT NON- HAZARDAN Material (20	Regulated Mor- beroante, spentails
Enter Quarter for One-Time Disposal, \(\bigcup \) \(\bigcup \) \Qtr./Yr. If Multiple Shipments Enter Frequency Here, \(\bigcup \) \(\bigc	times/yr. Yolume: (lbs.ng	yr. only)	✓ ► 140°F
Por DHEC Use Only: Notes: Notes: Month Date Year DHEC 1969 (Nov. 8/85)	i		Page 1

Authorization Request Form (Continued)

Facility Use Only:	•	<u>.</u>				•	•
1.						•	·i·
•	•	:			,	•	
Packaging for Shipment	In Drum	ns (size) 55 gal	In I	Dulk Other			
Method of Transportation,	Roilro	ad tanker		Other:	Specific (Gravity, <	· •••
Viscosity @ 70° F. L	w LJ w	Nedlum High	Layering	None , L	Dilayered		layered
Suspended Solids: % by we	lght or volu	rme, Specify exact % 🛂 📗	Dissolve	d Solids, by % weight, Sp	pecify exact %	6 41	
Thousands of Div's/lbs. Spec	ııyı L 	8-1010,000	Organic	· ally Dound Sulfur (wt. %):	<u> </u>	Organically Bo	und Chloride, <u>Ko.</u>
Organically Dound Hitrogen	(Wt %),	(0.1)		High Med		Unknown	Ash %. <u> < 8</u>
Affinity for Water, Hyd			drophilic, L		.· · .	· .	
Visual Description of Waster	Dark	Brown Oil			 		· · · · · · · · · · · · · · · · · · ·
Contiluants list reacific co	activoace by	u aama aad sawaraadiaa aa			•	•	
Volatile Organics	%	y name and corresponding pe Non-Volatile Organics	rcentage in %	Acid or Alkalis	%	Salts & Inorgan	Jan Dá
Tolome Organics		Oil: Lube /	90+	Acio oi Ainoiis	70	Julis o morgan	olics %
		on. due	100%				
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L		·		L.,		<u></u>	

Authorization Request Form

(Continued)

Met	dilic: (total	metals	not EP	Toxicity 1	lest)	
٠.	 					

As <u>43.0</u> ppm Cr+3 <u>45.0</u> ppm Ag <u>45.0</u> ppm Fe <u>∠6 · ∠</u> ppm Ba:....∠/00·0 ppm NI <u>LOL</u> ppm Cr+5 _ _ ppm Sb..... <u>∠0.2</u>ppm Hg <u>20.2</u> ppm Cd <u></-6</u> ppm Cu.... <u>40.2</u> ppm Mn <u>20.2 ppm</u> TI <u>402</u> ppm Pb..... 45.0 ppm Se <u>4.0</u> ppm Co <0.2 ppm Zn...._20.2ppm

Toxics

Cyanide..... <u>∠50</u> ppm Pesticides..... <50 ppm Carcinogens <u><50</u> ppm Other Toxics now ppm

Other Information: ___

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: _

TSD Facility Certification:

I certify that based on the information presented in this document this facility is permitted to accept the waste stream described hereon, and do hereby Inform the generator listed hereon of acceptance of the waste for treatment, storage, and/or disposal in the manner designated, and in compliance with the TSD Facility's standard terms and conditions.

Print Name: DonAld

Date Submitted: 06/08/95

Industrial Brokerage Charles Foushee 1-704-396-2308



the total solution

June 13, 1994

PHONE:

0704-399-3395° 80+62

Dana Container 7254 Mt Holly Road Charlotte NC 28214

ATTN: FROM:

Chuck Ferrell NAMY COLEMAN

RE:

WASTE PROFILE NUMBER:

Stream SE-16140-F003

Your Authorization Request Form has been submitted for you to SCDHEC on <u>June 8, 1994</u>. Unless there are questions, the legal date for first pickup will be <u>June 23, 1994</u>.

A copy of your ARF and a S.C. Manifest are enclosed so that you may familarize yourself with them. We will originate the manifest for you whenever a pickup is scheduled unless you prefer otherwise. Please let us know if this is the case.

LAND DISPOSAL RESTRICTION CERTIFICATION

A Land Disposal Restriction Certification (2 pages) must accompany each shipment of hazardous waste. A form is enclosed which is suitable for your use. This certification must have an original signature and filling it out is the generator's responsibility. On the second page of your ARF in the lower left-hand corner, you will find a breakdown of your waste. If your waste stays basically the same, you can use this as a guideline to fill out the checklist. Please retain a copy with each shipment of your waste for your records as it is required by inspectors.

DOT SHIPPING CODE:

Waste Flammable Liquid N.O.S. 3 UN1993 III Contains Acetone & Methyl Chloride

The above underlined DOT shipping code has been assigned to the your waste profile number. It is an important item that should be reviewed prior to first shipment.

Please review the Authorization Request Form carefully as any subsequent changes made (contact person, DOT/EPA waste codes, etc.) will entail an amendment process with the State of South Carolina. You will be contacted by our office to schedule a pick-up of your waste stream around the legal date. If you have any questions, please do not hesitate to contact us. We appreciate your business and look forward to working with you.

	Authorize South Carolina Departm 20007 Bureau of - AHAC/M		Environmental Control	Landfill Recycle Londfarm Other	☐ Recloim ☐ Incinerate ☐ Energy/Recovery
Authorization Nu Generator Information: Generator ID # W.C.D.O.7.4,5,0,5,8,5,8	mberi SEJ - III		•	To be entered by TSD Facility	105
Address 7254, Mt, HOLLY, A Official Contact Chuck Ferreit Title Treatment, Storage, or Disposal Facility Information	Complancing	Clty CH		SC County	Zip Code 28,21,4 –
Facility EPA IUD # S.C.D.O.3,6,2,7,5,0	6,2,6] Name: 7	755 Industrial Road Jumter, SC 29151	d • P.O. Drawer 1060		
DARK BROWN LQUD Description of Hazardous Waste FOO3 FOOZ DO SEPANDHEC Waste Codes		(0,8) DOT	1 DQ1 COQ41		Chapted N.O.S.
Enter Quarter for One-Time Disposal,	1.	Hazard Class Handling Metho	od, 5,0,1	Eut.	
If Multiple Shipments Enter Frequency Here () Physical State of Waste @ 70°F 1. solid 2. liquid 3. N/A	times/yr.	Volume: (lbs.ny Flash Point (cc) 1. \(\sum \) N/A	,	60-140°F 4.	► 140°F
Date Received:	Notes:				Poge 1
SHEC 1969 (Nev. 8/86)					ruge i

Authorization Request Form (Continued)

Facility Use Only:	:			<u> </u>	·			
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ockaging for Shipmenti V In Drums (size) 55 ga		اللا	Dulk C	ther	•	•		•
ethod of Transportation: Railroad tanker	✓ Truck	<u></u>	Otheri	Specifi	c Gravity, 🗲	ا	٠.	·•·
cosity @ 70° F. Low Medium High	h :::	Layerin	ng, None	Dilayere	d <u>L</u>	Multilayere	д .	٠,
spended Solids: % by weight or volume, Specify exact	% [<u>0</u>]	Dissolv	ed Sollds, by % welg	ht, Specify exac	1 % <u>O</u>			1
ousands of Div's/lbs. Specify	<u>.</u> ∫:	Organi	cally Bound Sulfur (w	ı. %), <	Organic	ally Bound C	hloride	<u><</u>
Organically Bound Nitrogen (Wt %), [5]		Toxicity	/، L High 'L	Medlum L	Unknown	,	Ash %, L	<u>.</u>
finity for Water Hydrophilic Lipophilic	pH (II hyd	ophilic	5-7]		• •	•		į
sual Description of Waster <u>Caul Wilwn L</u>	igiuid'					 -	<u> </u>	·
instituents: List specific constituents by name and corres	<i>U</i> nondina neri	entone	in waste stream.	·		٠		
Volatile Organics % Non-Volatile Org	•	%	Acid or Alkalis	%	Salts G	Inorganics		Q
factore 20-35								_
nethyl Chloride 10-20	:	1						
Varnish 18-20	1							
Ethylene glycne 20-30/16	!					•		
6 6 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1						•		•
	1				\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \			
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Taler: 15-20 %	 		L		J (.		_

Authorization Request Form (Continued)

Met	dilic, (total metals not EP Tox	cicity Test)			Tox	lcsı	
	As <u>45 · 6</u> ppm, Bo : <u>4/00 · 6</u> ppm Cd <u>4/ · 0</u> ppm	Cr+3 45.0 ppm $Cr+5$ ppm	Ag <u>250 ppm</u> NI <u>26.2 ppm</u>	Fe <u>∠0.2</u> ppm Sb <u>∠0.2</u> ppm Mn <u>∠0.2</u> ppm		Cyanide Pesticides	<u>450</u> ppm
	Pb	Hg 202 ppm Se 2/.0 ppm ppm ppm	TI <u>∠6.</u> 2 _{ppm} ppm	Co ppm ppm ppm		Carcinogens Other Toxics	
Oth	er Information:			· .			
•				:			
Ce	rtification:		·				•
	curate, and complete. I am a knowing violations. Against tree.	aware that there are signific	ng the Information, the Information (Information) is a submitting the Information (Information) is a submitted (Information) in Information (Information) is a submitted (Information) is a submitted (Information) in Information (Informa	Date Submitted;	ie possil	H-20	Imprisonment for
TSE	D Facility Certification	•					
		ereon of acceptance of the	s document this facility is pern e waste for treatment, storage		nner de:	signated, and in	
	Print Name: Dun	Ald F.	Fitch.), ne	con	



motiviles lenot and

June 16, 1994

PHONE:

704-399-3395

Dana Container 7254 Mt Holly Road Charlotte NC 28214

ATTN:

Chuck Ferrell

FROM:

NANCY POLEMAN

RE:

WASTE PROFILE NUMBER: Stream SE-16139-F001

Your Authorization Request Form has been submitted for you to SCDHEC on June 13, 1994. Unless there are questions, the legal date for first pickup will be June 30, 1994.

A copy of your ARF and a S.C. Manifest are enclosed so that you may familarize yourself with them. We will originate the manifest for you whenever a pickup is scheduled unless you prefer otherwise. Please let us know if this is the case.

LAND DISPOSAL RESTRICTION CERTIFICATION

A Land Disposal Restriction Certification (2 pages) must accompany each shipment of hazardous waste. A form is enclosed which is suitable for your use. This certification must have an original signature and filling it out is the generator's responsibility. On the second page of your ARF in the lower left-hand corner, you will find a breakdown of your waste. If your waste stays basically the same, you can use this as a guideline to fill out the checklist. Please retain a copy with each shipment of your waste for your records as it is required by inspectors.

DOT SHIPPING CODE: Waste Flammable Liquid N.O.S. 3 UN1993 III Contains Acetone & Oil

The above underlined DOT shipping code has been assigned to the your waste profile number. It is an important item that should be reviewed prior to first shipment.

Please review the Authorization Request Form carefully as any subsequent changes made (contact person, DOT/EPA waste codes, etc.) will entail an amendment process with the State of South Carolina. You will be contacted by our office to schedule pick-up of your waste stream around the legal date. If you have any questions, please do not hesitate to contact us. appreciate your business and look forward to working with you.

Southeastern Chemical Co.

755 Industrial Road

PO Box 1030

Sumter, SC 29151 803-773-1400 FAX: 803-775-7016 Toll Free: 800-872-7002

South Carolina Department of Health and Environmental Control Recycle Incine	\ \ \ \
Authorization Number: SE - 16.39 - E0.01 To be entered by TSD Facility Generator ID # W.C.D074505850 Name DANA CONTAINER	
Address 7,254 Mt Holl 4 Road Official Contact CHUCK FERRELL Title Compliance Mgr. Telephone 7,041 3,991 33,95 Area Code SC County (For In-state Southeastern Chemical & Solvent Company 755 Industrial Road • P.O. Drawer 1060 Sumter, SC 29151	لتست
Line # (This line # will always represent this specific waste stream) DARN BLOWN LIGUID Description of Hazardous Waste FOUT FOUZ FOUZ FOUZ DOT EPAI DHEC Waste Codes DOT Hazard Class Process Producing Waster Janker Claw Out DOT Code: RQ, Waste Flammable Light Contains fretone & Oil 3, UN-1999	rud nos,
Enter Quarter for One-Time Disposal, \[\	
Date Received: Notes: Notes: 1969 (Nev. 8/86)	Page 1

Authorization Request Form (Continued)

Epclity Use Only:				· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
Packaging for Shipment, 🕌 In D	rums (size) 55 gal	ir	Bulk Oth	et		
Method of Transportation, Ra	llroad tanker		J Other L	Specific G	Gravity, 6.2	
Viscosity @ 70° F, L Low	Medium High	Layerir	ng, None	Dilayered	Multiloyere	ed .
Suspended Solids, % by weight or v	volume, Specify exact % UA	Dissolv	; ed Solids; by % welghi	. Specify exact %	NA	•
Thousands of Blu's/lbs. Specify:] 8 to 10,000	Organ	cally Bound Sulfur (wt.	%), [0]	Organically Bound (Chloride, 2
Organically Bound Nitrogen (Wt %):	1				Unknown	Ash %, 25
Affinity for Water, Hydrophilic	i :		•			
Visual Description of Waster	^		·······			
1;				•	:	·
Constituents: List specific constituent Volatile Organics %	Non-Volaille Organics	centage %	Acid or Alkalis	%	Salts'& Inorganics	. %
· Solventa: Acctone 20.30	1	1/0.50				
(methyl choloride	- Waxtuail.					
Varnier	(Spentoil				:	
Ethylene glycol Ethylene	Potassium Chrmut	10-15				
Gau 10-1		10.15				
	antiblaze	10-16				
	Wood Arducte	10.15				
	 	_		<u></u>	1	
5-10	J L.,					
Water 5-10 %	•					

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Page 2

Authorization Request Form

cicity Test)	•		Toxicsi	
Cr+3 <u>∠.5.0</u> ppm Cr+5 ppm	Ag <u>45.0</u> ppm NI <u>40.2</u> ppm TI <u>40.2</u> ppm ppm ppm	Fe	Pesticides <u>450</u> ppr Carcinogens <u>450</u> ppr	n n
	· · · · · · · · · · · · · · · · · · ·	·		_
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ctly responsible for gatherl	ng the Information, the Information to the Information of the Informat	notion submitted is, to the bealse information, including the	st of my knowledge and bellef, true,	oc.
	:!		•	•
formation presented in thi ereon of acceptance of th	s document this facility is perre waste for treatment, storage	nlited to accept the waste st e, and/or disposal in the man	tream described hereon, and do here nner designated, and in compliance w	by lth
	Cr+5ppm Hg20.2 ppm Se21.0 ppm —ppm that this document and all nnel properly gather and eacily responsible for gatherlaware that there are significant the significant formation presented in this formation presented in this	Cr+3	Cr+3	Cr+3



Industrial Brokerage Services, Inc.

June 10, 1994

TO: BECKY OR JEREMY

FROM: DEBBIE GIANNI

Enclosed is the copy of Waste Oil Rebuttal that you requested.

Thanks for all your hard work on this.



Industrial Brokerage Services, Inc.

>>>> FAX FACT <<<<<

WASTE BROKERAGE AND

ENVIRONMENTAL SERVICES
DAVID L. HAYNES, ENGINEER
P.O. BOX 1263
LENOIR NC. 28645

AGES INCLUDING THIS COV	
15 75 (2015 56 57 170 36	AND FAX BACK TOME
THEY PEC Emovers	

SOIL REMEDIATION, ENVIRONMENTAL AUDITS, WASTE BROKERAGE, WASTE TRANSPORTATION AND DISPOSAL, FULL SERVICE ANALYTICAL LABORATORY, UNDERGROUND STORAGE TANK MANAGEMENT.

THANK YOU DAN 120



Industrial Brokerage Services, Inc.

>>>>> FAX FACT <<<<<

WASTE BROKERAGE AND

ENVIRONMENTAL SERVICES DAVID L. HAYNES, ENGINEER P.O. BOX 1263 LENOIR NC, 28645

TO: CHUCK REF	: ////02///02/25
# PAGES INCLUDING THIS COVER:	7
MEMO: PLEASE SIGNAL AND	FIGX BACK TOME
5/GN AT X'S 3/	
OFFICE (704) 396-4319 FAX (704)	396-2367 CAR (704) 396-0801
SOIL REMEDIATION, ENVIRONMENTAL TRANSPORTATION AND DISPOSAL, FULL UNDERGROUND STORAGE TANK MANAGEMENTS.	LL SERVICE ANALYTICAL LABORATORY

THANK YOU DAND

	•	•	-	
MATERI	A	L	PROFIL	E

New Amendment			
A. GENERATOR INFORMATION Generator Name DANA CONTAINETO Facility Address 72.54 MT Holly		Telephone (704) 396.	11D HAYNES -4319 EXT. 367
Obullance A Hrade - Train	28214	Billing Address P. CI City CCNOIP	State ALC Zip Code 28645
B. DOT Shipping Name HAZARAGUS WAN INC.S CRONTENA ACPTA NAPTOR UN/NANO. 2077 Packing Group C. RCRA RCRA Non Hazardous/Exempt? D Yes Extra CUTTAN CUTT State Waste Codes: EPA Waste	s porum Ify profest azard Class 9 D RO No Process Generating	SIC Code: Source Code: Form Code: Origin Code: System Type:	E. OTHER COMPONENTS No Yes Total ppm PCB's - Cyanides
F. PHYS.GAL CHARACTERISTICS AT 70° E 1. Infectious or Biological Waste? 2. NRC Regulated Radioactive? 3. Reactivity None Pyrophoric Cyanides Cyanides Cother	Dry Weight	% □ 20-100% 10	foot Dermal Toxicity LD ₅₀ (Mg/Kg) □ ≤40 □ >200, ≤1000 □ >40, ≤200 □ >1000 4. Material poisonous by inhalation? □ Yes □ No □ Oral Toxicity LD ₅₀ (Mg/Kg) □ ≤5 □ >5, ≤50 Solids: □ >50, ≤200 □ >200 Liquids: □ >50, ≤500 □ >500
Gas (Cylindar) Solid 100 % Aerosol Siudges % Lab-Pack Free Liquids 100% Layers Sinole Lavered Bi-lavered Multi-lavered Viscosity Low Medium Shigh Odor None Mild Strong Describe: SOLVENT Color/Appearance: BLACK SOLID	Flash Point (liquid only) 73°F (23°C) 73°140°F (23-80°C) 142-200°F (81-93°C) NA BTU/Lb. CSCOO H. PHYSICAL CHEMICA CHUS DC Wi	Boiling Point	5. Is this waste stored in vented drums? Tyes 2N 6. Is this waste pumpable? Tyes 2N 7. Is this waste polymerizable? Yes 2N 8. Is waste stream subject to the National Emission Standards for Benzene Waste Operations (40 CFR 61 Subpart FF)? Tyes 2N 9. Is this waste regulated as an ozone depleting substance (40 CFR part 82)? Tyes 2N
G. METALS I NONE TCLP (MG/L) TOTAL (PPM) Reg. Limit Below Above Range	CATTAND (Attach All MSDS, Sar	GRIT 85	Note Note

Generator's Certification:

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hezards have been disclosed. I certify that the materials tested are representative of all material described by this profile.

Generator's Authorized Signature:

Leville I

Date X-//-/4

AUG 17 '94 14:44 IBS INC		ME OF WASTE	STREAM		MATE	P.2	ilu.
LAII DIE ENVIRONMENT	44						
A. GENERATOR INFORMATION Generator Name DANA CONTAINET Facility Address 72.54 MT Holly	ROAD.	Technical Contact Telephone (ベッソ) Fax (メッソ) 3° Billing Name	396-43 396-43 14045	319 1 11AC BA	lo/Lula		
City/County CHARGITE State NC Zip Code USEPA ID# NCD 0 24 50 5 850 State ID#	28219	City CGP-CO/ Attention	£			p Code _2.80	645°
B. DOT Shipping Name HAZARAOUS CONTINUES CONTINUE ACPHA MAPPINE HOUSE UN/NA No. 2077 Packing Group C. RCRA RCRA Non Hazardous/Exempt? D Yes & TANK CUETM OCCT State Waste Codes: EPA Waste	Hazard Class 9 FI RO Solver Row Solver Row Process Generating	SIC Sol For Original Sic Sol Sol	Code: urce Code: _A m Code: _B gin Code: stem Type: _M	 	PCB's Cyanides Sulfides Pesucides Phenotics Dioxins Halogens	OMPONENTS Yes Dappappl	Total ppm
F. PHYSICAL CHARACTERISTICS AT 70° F 1. Infectious or Biological Waste? Yes No	Weight lbs./g	al. (US. Ilo)	lbs./cu, foot	Dermal To	kicity LD ₅₀ (M	ig/Kg)	
2. NRC Regulated Radioactive?	□ 1-5 pH □ N/A □ 0-2 □ 4.1- □ 2.1-4 □ 10.3	0% □ 5-20% % □ 20-100 -10	%	☐ ≤40 ☐ >40, ≤20 4, Material Oral Toxicil	□ >200	, ≤1000 0 nha!ation? ⊡ (o)	
☐ Gas (Cylinder) ☐ Solid	☐ 73-140°F (23-80°C) ☐ 142-200°F (51-93°C) ☐ >200°F (93°C) ☐ N/A	Boliing F □ <95°F	F (35°C) F (35°C)	5. Is this wa 6. Is this wa 7. Is this wa	aste stored in v aste gumpable aste polymeriza	ented druma? ? tble?	□Yes ⊇N □Yes ⊇N □Yes ₽N
Uscosity Low	H. PHYSICAL CHEMICA ACPHA NAM CACITIC WI	THA		Standard [40 CFR 9. Is this was substance 10. Does this	stream subject is for Benzene 61 Subpart FF aste regulated to CFR par a waste contain han 2 Inches in	Waste Operati }? as an ozone de t 82)? scrap metal p	ions Yes 21N epleting Yes 2N
G. METALS INONE ITCLP (MG/L) ITOTAL (PPM)	WATER DIRT AND	GPIT.	<u>/0</u> %	I. ANTICIPA	ATED VOLUM	E Qty. Contain	ner
Reg. Limit Below Above Range			% % %		i gl. pall □ 5 gl. carboy ☐ 10 gl. drum □ 15 gl. drum ☐ 15 gl. drum ☐	Super S Rolloff/ Tanker	Dump Traile
1 mg/L 2			% %	. 0		Week ! Other	☐ Month

Others:

Generator's Certification:
Thereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or supported hazards have been disclosed. I certify that the materials tested are representative of all material described by this

(Attach All MSDS: Sample Analysis and Adoltional Info.)

Generator's Authorized Signature:

(*) Is this waste regulated as a Marine Pollutant (49 CFR 171.8)? ☐ Yes ☐ No

100 %

New Amendment		
A. GENERATOR INFORMATION Generator Name DANA CONTRINCT Facility Address 72.54 MT Itolly	Telephone (704) 396 Roff 376 - 20	D HAYNES -4319 EXT. SG7 STP(AC BROKENLASE SCAVICES BOX 1263
City/County C ##R & TTE State NC Zip Code USEPA ID#	28214 City CENCOLE Attention	1.25%
B. DOT Shipping Name HATHROUS WAS INOS CONTROL ALPHA NAPAH , UN/NA No. 2077 Packing Group C. BCBA RCRA Non Hazardous/Exempt? Yes 2 'TANK CUFFM OUT State Waste Codes: EPA Waste	D. ANNUAL RESOLUTION OF SIC Code: Source Code: Form Code: Origin Code: System Type:	PORT CODES E. OTHER COMPONENTS No Yes Total ppm PCB's
F. PHYSICAL CHARACTERISTICS AT 70° F 1. Infectious or Biological Waste? ☐ Yes ☐ No 2. NRC Regulated Radioactive? ☐ Yes ☑ No 3. Reactivity ☑ None ☐ Water Reactive ☐ Pyrophoric ☐ Shock Sensitive ☐ Cyanides ☐ DOT Explosive ☐ Sulfides ☐ Other ☐	Weight Density Ibs./gsl. (US, liq) Ibs./cu. for D5-20% Dry Weight □ <1.0%	Dermal Toxicity LD ₆₀ (Mg/Kg) □ ≤40 □ >200, ≤1000 □ >40, ≤200 □ >1000 4. Material paisonous by inhalation? □ Yes □ No Oral Toxicity LD ₆₀ (Mg/Kg) □ ≤5 □ >5, ≤50 Solids: □ >50, ≤200 □ >200 Lfquids: □ >50, ≤500 □ >500
Gas (Cylinder) Solld 100 % Aerosol Sludges % Lab-Pack Free Liquids % Layers Single Layered Bi-layered Multi-layered Viscosity Low Medium SHigh Odor None Mild Strong Describe: SOLVENT Color/Appearance: BURCK SOUD	Flash Point (liquid only) <73°F (23°C)	5. Is this weste stored in vented drums? □ Yes ②No 6. Is this waste pumpable? □ Yes ②No 7. Is this waste polymerizable? □ Yes ②No 8. Is waste stream subject to the National Emission Standards for Benzene Waste Operations (40 CFR 61 Subpart FF)? □ Yes ②No 9. Is this waste regulated as an ozone depleting substance (40 CFR part 82)? □ Yes ②No 7% 10. Does this waste contain scrap metal pieces preater than 2 inches in strap
G. METALS NONE TCLP (MG/L) TOTAL (PPM) Reg. Limit Below Abova Bangs Arsenic 5 mg/L Cadmlum 1 mg/L Chromium 5 mg/L Copper Lead 5 mg/L Mercury 0.2 mg/L Nickel 134 mg/L Selenium 1 mg/L Zinc Others:	MATTER 10 PIRT AND GRIT 85 (Attach At MSDS, Sample Analysis and Additional Info.)	■ I ANTICIPATED VOLUME

.

Service and

::

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. The profile.

Generator's Authorized Signature:

Date

Date

_Generator's Authorized Signature:

TO RULE CERTIFICATION/RECERTIFICATION FORM

			•		
Generator Name: DANE	CONTAINS	72	malabita est e de richteration aggs. Cristale eventes	EPA	ID#: <u>//c/1074/5</u> 7
Location: 72.54	MT HOLLY	POAD	CHARGOTE	NC 283	14
Profile #:					[Mark of Wall - 1987] - 1987 - 1988 - 1988
CHARACTERISTICS OF HAT mandated by 40 CFR 261,21,			coniains any of the	following character	istics based on c
	*Regulatory Threshold Level	(Check One) Yes No	(Check Scientific <u>Data</u>	·	Actual Valu
D001 Characteristic of Ignitability	< 140°F		***		
D002 Characteristic of Corrosivity	≤ 2 or ≥ 12.5		PROPERTY AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON AND ADDRESS OF THE PE		Н
D003 Characteristic of Reactivity				-	
	*Regulatory		(Check	One)	
Constituent	Threshold Level, ppm	(Check One) Yes No	Scientifie	Generator's Knowledge	Actual Value
D004 (Arsenic)	5,0		and a resident of the last of		F000-0
D005 (Barlum)	100.0			***************************************	,
D006 (Cadmium)	1.0				
D007 (Chromium)	5.0		•		•
D008 (Lead)	5.0				
D009 (Mercury) D010 (Selenium)	0.2				
D011 (Silver)	1.0 5.0				~~~~~
D012 Endrin	0.02				
D013 Lindane	0.4		*		*
D014 Methoxychlor	10.0			The same of the sa	
D015 Toxaphene	0.5			100	
D016 2, 4-D (2,4-Dichloro- phenoxyacetic acid)	10.0				
D017 2,4,5- TP Silvex	1.0	سر		·	
D018 Benzene	0.5				
D019 Carbon Tetrachloride	0.5	<u> </u>	-	-	
D020 Chlordane	0.03			The same of the sa	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
D021 Chlorobenzene	100.0			and the same of th	

6.0

200.0

200.0

200.0

D022 Chloroform

D023 o-Cresol

D024 m-Cresol

D025 p-Cresol

ENVIAG 17 794 14: 48 IBS INC

SERVICES	*Regulatory		(Checi	k One)	
	Threshold	(Check One)	Scientific	Generator's	Actual Value
Constituent /	Level, ppm	Yes No	Data	Knowledge	bpm
X026 Cresol	200.0	ن م <i>س</i>			*
· · · · · · · · · · · · · · · · · · ·	200.0 7.5	~~~~		مرمر	
2027 1,4-Dichlorobenzene	-	•			
3028 1,2-Dichloroethane	0.5				
2029 1,1.Dichloroethylene	0.7				
2030 2,4-Dinitrotoluene	0.13	·			
2031 Heptachlor	0.008				
(and its hydroxide)	<u>-</u>				•
2032 Hexachlorobenzene	0.13		<u>, , , , , , , , , , , , , , , , , , , </u>		
2033 Hexachlorobutadiene	0.5		-		
2034 Hexachloroethane	3.0				
2035 Methyl ethyl ketone	200.0		***************************************		
2036 Nitrobenzene	2.0	·	-		
>037 Pentachlorophenol	100.0				
0038 Pyridine	5.0				
2039 Tetrachloroethylene	0.7				
2040 Trichloroethylene	0.5				·
2041 2,4,5-Trichlorophenol	400.0				
2042 2,4,6-Trichlorophenol	2.0			······································	··
2043 Vinyl Chloride	0.2				·

^{*} As defined by the TCLP (Method 1311), EP Toxicity is no longer acceptable.

LISTED" Hazard	ous Wastes: Indicate if thi	s waste also contain	is any listed hazardou:	wastes coded in 40 (CFR 26131, 26132, and
61_33 by including	g the appropriate EPA bazz	ardous waste code(s) .		
		•			
				•	
	1 .	•			

TENERATOR CERTIFICATION:

I hereby certify that all information submitted on this form and all attached documents are true and accurate. In the event not this form is not fully completed, I authorize Laidian Environmental Services (TS), Inc. to conduct necessary testing at my expense a properly complete the form 1 1 2 2 2 2

Asignature: Charles Ferrell III Date: 8-17-94

Print Name: CHARLEY FERRELL III

THE THINK WASH

THIS CERTIFICATION/RECERTIFICATION IS REQUIRED FOR EACH PROFILE TO LAIDLAW ENVIRONMENTAL SERVICES (TS), INC.

ORIGINAL SIGNATURE REQUIRED

aidlaw Environmental Services (TS), Inc. (Jan. 1992)

ENVIAUG 17 794 14:48 IBS INC

SERVICES		. •			
7. 10.	*Regulatory	•	·(Checl	k One)	
₩ 1 ₩ 1	Threshold	(Check One)	Scientific	Generator's	Actual Value
Constituent	Level, ppm	Yes No	<u>Data</u>	Knowledge	mad
	•		, -		316 35 30
2026 Cresol	200.0		,		
2027 1,4-Dichlorobenzene	7.5	~~~			
2028 1,2-Dichloroethane	0.5				
2029 1,1.Dichloroethylene	0.7				· ·
>030 2,4-Dinitrotoluene	0.13		-		•
2031 Heptachlor	0.008			<u></u>	
(and its hydroxide)					
2032 Hexachlorobenzene	0.13				
2033 Hexachlorobutadiene	0.5		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		*
2034 Hexachloroethane	3.0				
0035 Methyl ethyl ketone	200.0		***************************************		_
2036 Nitrobenzene	2.0				
>037 Pentachlorophenol	100.0				
0038 Pyridine	5.0				
2039 Tetrachloroethylene	0.7	,			
2040 Trichtoroethylene	0.5 .				
0041 2,4,5-Trichlorophenol	400.0				
2042 2,4,6-Trichlorophenol	2.0			and the same	
2043 Yinyl Chloride	0.2				

^{*} As defined by the TCLP (Method 1311), EP Texicity is no longer acceptable.

LISTED" Hazard	<u>dous Wastes:</u> Indicate i	l this waste also contai	ins any listed hazardou	s wastes coded in 40 Ch	R 26131, 26132, and
61.33 by includia	ng the appropriate EPA	bazardous waste code((s).		
-					

ENERATOR CERTIFICATION:

I hereby certify that all information submitted on this form and all attached documents are true and accurate. In the event not this form is not fully completed, I authorize Laidiaw Environmental Services (TS), Inc. to conduct necessary testing at my expense properly complete the form //

Frint Name: CHARLEY FERRELL III

Date: 8-17-94

Tille: TPANK WASH

MANAGER

THIS CERTIFICATION/RECERTIFICATION IS REQUIRED FOR EACH PROFILE TO LAIDLAW ENVIRONMENTAL SERVICES (TS), INC.

ORIGINAL SIGNATURE REQUIRED

aidlaw Environmental Services (TS), Inc. (Jan. 1992)

□ New · □ Amendment	· · · · · · · · · · · · · · · · · · ·			t de la companya de l
A: GENERATOR INFORMATION Generator Name DANA CONTHINETE Facility Address 7254 MT HOLLY	Pong	Technical Contact 0/9/10 Telephone (704) 356-43 Fax (704 376 - 336 Billing Name /NOUSTRIA	19 7 7c Brokenase	EXT
City/County C. HTHR LO 176	289-14	City 467V01/2 Attention Telephone ()	State &VC_Z	p Code <i>J&G45</i>
B. DOT Shipping NameHAZARDOUS	AZARD Class 9 RO No Process Generating	D. ANNUAL REPOR SIC Code: Source Code: A Form Code: B Origin Code: System Type: M	T CODES E. OTHER C PCB's Cyanides Sulfides Pesticides	OMPONENTS No Yes Total ppm D C C C C C C C C C C C C C C C C C C
F. PHYSICAL CHARACTERISTICS AT 70° F				
1. Infectious or Biological Waste? Yas	D1-59 PH DN/A 0-2 -24.1- 0-2 -24.1- 10.1 Flash Point (liquid only) 473°F (23°C) 73-140°F (23-60°C) 142-200°F (61-93°C) N/A BTU/Lb. 5000 H. PHYSICAL/CHEMICA METHYL ETT KEROSENE SILVET? BEN/ZENE	## ☐ 20-100% 10	Oral Toxicity LD ₃₀ (Mg/K □ ≤5 Solids: □ >50, ≤200 Liquids: □ >50, ≤200 5. Is this waste stored in v 6. Is this waste pumpable? 7. Is this waste polymeriza 8. Is waste stream subject Standards for Benzene 40 CFR 61 Subpart FF 9. Is this waste regulated a substance (40 CFR par 10. Does this waste contain greater than 2 inches in	. \$1000 0 0 hhalation?
Reg. Limit Below Above Range	CHLOPO BENZ TETRACHLORO DIRT APURI C	Benzene .3 %	5 gl. pail	Cubic Yard Box* Super Sack* Rolloff/Dump Trailer Tanker* Other Week

Generator's Certification:
I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the materials tested are representative of all material described by this profile.

Generator's Authorized Signature:

LAIIDLAN ENVIRONMENTAL SERVICES ☐ New □ Amendment Technical Contact DAYID HAYNES A. GENERATOR INFORMATION Generator Name DANA CONTAINER Telephone (704) 396-4319 Facility Address 7.2.54 MT Itally Port Fax (704 376 - 2367 Billing Name /NOUSTRIAL BROKERAGE SCRVICES INC Ellling Address A.O. Box 1263 City/County CHTE LO 176 Zip Code 287-14 City 4674012 State MC Zio Code 28645 USEPAID# ACDO74505 850 Attention -State ID#_ Telephone (EXT. _ B. DOT Shipping Name HAZARDOUS WASTE SOUN D. ANNUAL REPORT CODES E. OTHER COMPONENTS N.O.S. Yes Total ppm SIC Code: سيع Hazard Class . PÇB's UN/NA No. 3077 Source Code: A ______ 0 Packing Group_ Cyanides مسيطر Form Code; B Sulfides C. RCRA RCRA Non Hazardous/Exempt?

Yes Z No Process Generating: Origin Code: ___ Pesticides Ø TANK CLEAN OUT Z System Type: M **Phenolics** State Waste Codes: EPA Waste Codes: Doo! Ø Dioxins B. Halogens F. PHYSICAL CHARACTERISTICS AT 70° F Weight 1. Infectious or Biological Waste? ☐ Yes 😑 No Dermai Toxicity LD₅₀ (Mg/Kg) Density _lbs./cu. foot □ <1.0% □ 1·5% ☐ \$200, £1000 2. NRC Regulated Radioactive?

Yes ETNo Dry Weight □ ≤40 ☐ 20-100% ☐ Water Reactive □ >40, ≤200 3. Reactivity ₽None □ >1000 □ N/A 4. Material opisonous by inhalation? ☐ Yes ☐ No Oral Toxicity LD_{so} (Mg/Kg) ☐ Pyrophoric □ Shock Sensitive ☐ DOT Explosive ☐ Cyanides ☐ Sulfides □ 0-2 .1.10 **ご≥12.5** ☐ ≤5 Soilds: ☐ >50, ≤200 Liquids: ☐ >50, ≤500 2.1-4 □ 10.1-12.4 Exact Flash Point (liquid only) 100 ☐ Gas (Cylinder) ☐ Solid **Boiling Foint** ☐ <73°F (23°C) -73-140°F (23-60°C) €35°F (35°C) ☐ Aerosol ☐ Sludges % ☐ Lab-Pack ☐ Free Liquids % 142-200°F (61-93°C) □ >95° □ N/A >95°F (35°C) Is this weste stored in vented drums? ☐ Yes ₽ No >200°F (93°C) N/A 100% 6. is this waste pumpable? ☐ Yes-EINo 7. Is this waste polymerizable? Layers ☐ Yes-2TNo Single Lavered | Bi-lavered | Multi-layered BTU/Lb. 8. Is waste stream subject to the National Emission 15000 Standards for Benzene Waste Operations Viacosity □ Low ☐ Med!um

— -ET High (40 CFR 61 Subpart FF)? ☐ Yes-ĒÑo H. PHYSICAL/CHEMICAL CONSTITUENTS 9. Is this waste regulated as an ozone depleting Odor □ None - □ Mild □ Strong Describe: substance (40 CFR part 82)? ☐ Yes ☑ No METHAL ETHAL KEYRME 3 % 10. Does this waste contain scrap metal pieces Yes ZiNo Color/Appearance: greater than 2 Inches in size? KERUSENE SULID 316 V672 G. METALS I. ANTICIPATED VOLUME J. BENZENE ☐ TCLP (MG/L) ☐ TOTAL (PPM) □ NONE Container Qty. Container 4 CHLOPO BENZENE Reg. Limit Balow Aboya Range 5 gl. pail ☐ 15 gl. carboy ☐ 5 mg/L Arsenic Cubic Yard Box* TETRACHLORO BONZONO 100 mg/L Super Sack* Barlum 30 gl. drum 🖸 _____ Rolloff/Dump Trailer* Cadmium 1 mg/L DIRT AND GREET 85 Chromium 5 mg/L Tanker* 85 gl. drum 🛛 Copper _Other_ 5 mg/L Lead 0.2 mg/L Mercury ☐ 1 Time ☐ Year ☐ Week □ Month Nickel 134 mg/L Per 1 mg/L ☐ Other Selenium 5 mg/L Silver Zinc (*) Is this waste regulated as a Marine Pollutant Others: (49 CFR 171.8)? ☐ Yes ☐ No 100 % (Attach Ail MSDS, Sample Analysis and Additional Info.)

Generator's Certification:

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the material stested are representative of all material described by the profile.

enerator's Authorized Signature:

terrell TIT

Date 7-17-9

ENVIAUG 17 '94 14:49 IBS INC SERVICES

TC RULE CERTIFICATION/RECERTIFICATION FORM

Generator Name: DANA	CONTAINER) 		EPA :	ID#: <u>∧/cゐ<i>07</i>4</u> .
Location: 72,54	MT HOLLY	ROAD	CHARGETHE	NC 2821	4
Profile #:	<u>'</u>	<u> </u>	•		- 4년 구기 2년
CHARACTERISTICS OF H	AZARDOUS WASTE: I	ndicate if this waste o	contains any of the	following characteri	stics based on cr
mandated by 40 CFR 261.21,	, 261.22, 261.23 and 261	.24.			
	•Regulatory	•	(Check	One)	
	Threshold	(Check One)	Scientific	Generator's	
	Level	Yes No	Data	Knowledge	Actual Value
D001 Characteristic of Ignitability	< 140°F		*		<u>°F</u>
D002 Characteristic of Corrosivity	≤ 2 or ≥ 12.5	<u> </u>	With the second the s		Hq
D003 Characteristic of Reactivity	···		Name of the latest of the late	.,	***************************************
•	*Regulatory		(Check	Onei	
	Threshold	(Check One)	Scientific	Generator's	Actual Value
Constituent	Level, ppm	Yes No	<u>Data</u>	Knowledge	ppm
D004 (Arsenic)	5.0	مسمسا		ware.	
D005 (Barium)	100.0				:
D006 (Cadmlum)	1.0				
D007 (Chromium)	5.0	سيند. عبيد			
D008 (Lead)	5.0				
D009 (Mercury)	0.2		*********	and a second	
D010 (Selenium)	1.0				
D011 (Silver)	5.0	ستند ست		***************************************	
D012 Endrin	0.02			- Andrews	
D013 Lindane	0.4				-
D014 Methoxychlor	10.0			- Andrews	
D015 Toxaphene	0.5				
D016 2, 4-D	10.0				
(2,4-Dichloro-	•				
phenoxyacetic acid)				•	
D017 2,4,5- TP Silvex	1.0	سيمس بهنا		and the same	
D018 Benzene	0.5				
D019 Carbon Tetrachloride	0.5				
D020 Chlordane	0.03	-		·	
D021 Chlorobenzene	100.0				
D022 Chloroform	6.0				
D023 o-Cresol	200.0	**************************************			
D024 m-Cresol	200.0		\$1000 BL/68R4-1-1-1-1	باسمونین بید دید. * معمورید	
D025 p-Cresol	200.0	، مممد			

ERVAUG 17 94 14:50	O TRS INC	- Continu	160 - ·	•	
ERVAUG 17 194 1410	*Regulatory		(Che	ck One)	••
•	Threshold	(Check One	•	Generator's	Actual Value
Constituent	Level, ppm	Yes No		Knowledge	mag
/ 11					
026 Cresol	200.0				
027 1,4-Dichlorobenzene	7.5	^			···
028 1,2-Dichloroethane	0.5	,	-		
029 1,1-Dichioroethylene	0.7	·		·	<u> </u>
030 2,4-Dinitrotoluene	0.13		<u> </u>		
031 Heptachlor	0.008				
(and its hydroxide)	,		. ,		•
032 Hexachlorobenzene	0.13				
033 Hexachlorobutadiene	0.5	·	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		·
034 Hexachloroethane	3.0			· · · · · · · · · · · · · · · · · · ·	
035 Methyl ethyl ketone	200.0	سے سمک	,	·	•
036 Nitrobenzene	2.0		·		
037 Pentachlorophenol	100.0				·
038 Pyridine	5.0				
39 Tetrachloroethylene	0.7				
)40 Trichloroethylene	0.5			- Indiana	
M1 2,4,5-Trichlorophenol	400.0		-	· · · · · · · · · · · · · · · · · · ·	
142 2,4,6-Trichlorophenol	2.0				
043 Vinyl Chloride	0.2	. — —			
* As defined by the	TCLP (Method 1311),	EP Toxicity is no	longer acceptable.		•
LISTED' Hazardous Waste			ny listed hazardous	wastes coded in 40 (CFR
F002 Fα	05 4	220	4002	U239	
:					
				•	•
				•	•

rent nse properly complete the form.

THIS CERTIFICATION/RECERTIFICATION IS REQUIRED FOR EACH PROFILE TO LAIDLAW ENVIRONMENTAL SERVICES (TS), INC.

ORIGINAL SIGNATURE REQUIRED

idlaw Environmental Services (TS), Inc. (Jan. 1992)

Print Name:

SERVAUG 17 '94 14:50	IBS INC		•	•	
	*Regulatory	•	(Che	ck One)	
	Threshold	(Check One)	Scientific	Generator's	Actual Value
Constituent	Level, ppm	Yes No	<u>Data</u>	Knowledge	mqq
X026 Cresof	200.0	·			
027 1,4-Dichlorobenzene	7 .5 .				
2028 1,2-Dichloroethane	. 0.5				
2029 1,1-Dichloroethylene	0.7				
0030 2,4-Dinitrotoluene	0.13			مسمه	
2031 Heptachlor	0.008				
(and its hydroxide)		,			_
2032 Hexachlorobenzene	0.13				:
2033 Hexachlorobutadiene	0.5			-	
0034 Hexachloroethane	3.0				
0035 Methyl ethyl ketone	200.0	ممل		- Lander	•
2036 Nitrobenzene	2.0				*·····
>037 Pentachiorophenol	100.0		,		
>038 Pyridine	5.0				_
2039 Tetrachloroethylene	0.7				
0040 Trichloroethylene	0.5				**************************************
2,4,5-Trichlorophenol	400.0				•
2042 2,4,6-Trichlorophenol	2.0	· · · · · · · · · · · · · · · · · · ·			· ·
>043 Vinyl Chloride	0.2				
* As defined by the T LISTED* Hazardous Wastes 61.33 by including the appro		le also contains an		wastes coded in 40 C	FR 26131, 26132, a
F001 F00		270	4002	4239	
	· 				
				•	
			•		
ENERATOR CERTIFICAT	ION:	۶,	•		. • •
I hereby certify that a nat this form is not fully com properly complete the form	pleted, I authorize Lai			to conduct necessar	
A) Sustaines	wing c	VUUL III		Date:	011-19
Print Name:	CHARLEY	FERREIL.	TII	Title:	THINK WASH
•				/	MANUAGER

THIS CERTIFICATION/RECERTIFICATION IS REQUIRED FOR EACH PROFILE TO LAIDLAW ENVIRONMENTAL SERVICES (TS), INC.

ORIGINAL SIGNATURE REQUIRED

sidlaw Environmental Services (TS), Inc. (Jan. 1992)