

File ID Number: HWCB2016433

DEQ/DWM/Hazardous Waste Section

NCD/NCR (other) Number: NCD074505850

Facility Name: Mast Brothers IBC Cleaning

Address: 7254 Mt. Holly Rd.

City: Charlotte

County: Mecklenburg

File Date Range: 8/17/94—9/18/98

Document Type (s)

- Inspection Reports
- *NOV (See Comments)
- * Compliance Orders/Settlement Agreement (See Comments)
- *(Provide NOV Type, Docket Number and Date of NOV in Comment Section)
- Correspondence/Letters
- Pictures (Tape to a full sheet of paper)
- ** Name Change and Date of Change
- ** (Write Name Change Information in Comment Section)
- Sampling Data
- Other Information (See Comments)

Comments:

Box ID Number:



NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT



JAMES B. HUNT JR.
GOVERNOR

WAYNE McDEVITT
SECRETARY

WILLIAM L. MEYER
DIRECTOR

September 18, 1998

DANA TRANSPORT INC
7254 MT HOLLY RD
CHARLOTTE NC 28214-



RE EPA ID NO.: NCD074505850

Dear Sir/Madam:

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.

Sincerely,

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

cc: JOE PARKER

State of North Carolina
Department of Environment
and Natural Resources

Division of Waste Management

September 18, 1998



P. O. Box 29603
Raleigh, North Carolina 27611-9603
Voice 919-733-2178

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

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
Status: LOG Type of Inspection: CEI
Inspector(s): Joseph Parker - Waste Management Specialist, Dan Graham - Waste Management Specialist
Present at Inspection: Frank Riddle - Dana Transport, James Adams - 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.

Wastes Generated: The following hazardous wastes have been generated since the last inspection:

D001 - Waste Flammable Liquids (ink, varnish)
D001 - Waste Resin Solution
D001 - Waste Flammable Liquid (ethanol, varnish)
D001 - Waste Flammable Liquid (naphthol, latex)
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)

Manifests: Approved Transporters ? Yes 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) The 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.

→ STARTED NEW INSPECTIONS - weekly basis

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? Yes, documented in 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 (STARTING NEW RECORDS FOR MAST) BAS.

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? Releases of hazardous waste and petroleum material were observed during the inspection. These areas will be noted later in the report.

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: The facility has a variety of equipment including absorbents (pigs), shovels, overpack drums, and ppe.

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

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

All Personnel Handling HW have Access to Alarm/Device? Yes, phones in each bay

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): 0

Location(s): The facility does not have any satellite accumulation areas for hazardous waste. 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? N/A

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 be 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 be transferred to a container in good condition.

→ 2 *unpacked - gone - sent out 6-7-99 - HNJ BMM*

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.

→ *STARTED NEW INSPECTION LOG 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.

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,

→ 1998. 6-7-99 - 8 employees trained in HW management

4. 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 material was probably gone - they really do not know where.*

5. 40 CFR 262.34(a)(4) ref. 40 CFR 265.52(d), states that the contingency plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency 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 coordinator will change - Frank ~~the~~ Riddle Bill Miller*

6. 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;

- (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). *fax received 6-3-99*

original was in file 1

7. 40 CFR 268.7(a) (1), 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. to 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 unit - will remediate the surrounding soil.
Unit will be out within the next week*

Page Seven - RCRA Inspection Report

Facility Name: Dana Transport, Inc.

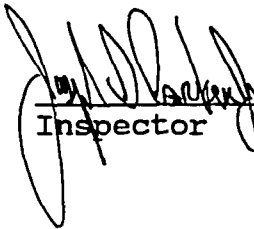
EPA ID#: NCD 074 505 850 Inspection Date: May 3, 1999

Recommendations:

1. During the inspection, it was noted that the facility had numerous open fifty-five gallon containers in the area located behind their main building. These containers were noted as holding rainwater, process water, and trash. It is recommended that the facility manage these containers in some other way.

Comments:

The above site deficiencies will be addressed in an enforcement document, that will be issued from the Raleigh Central Office. Dana Transport, Inc. will have 30 days, after the date of issue, to come into compliance with this document. If the facility has any questions please contact Joe Parker at the Mooresville Regional Office (704) 663-1699.

 June 7, 1999
Inspector (Date)

(CERTIFIED MAIL)
Facility Contact (Date)

Follow Up Inspection:

Comments: _____

Inspector (Date)

Facility Contact (Date)

REMTECH GROUP

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 6152042 shipped on 3-12-98 A copy of the manifest in question is attached.

SECTION	SHOULD READ
<u>11a</u>	<u>RQ Waste Flammable liquid, N.O.S. (Methylene Chloride)</u> <u>3, NA 1993, PG III, ERG# 128</u>
<u>11at I</u>	<u>add 0001</u>
<u>Jb</u>	<u>SL</u>

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
Rita Black
Manifest Clerk

cc: Other State Environmental Agency
(as necessary)
Named Generator
Named transportor



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Land Recycling and Waste Management
P.O. Box 8550

Harrisburg, PA 17105-8550

OFFICIAL PENNSYLVANIA MANIFEST FORM

BRO04198

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

FM-LRWM0051 REV. 11/95

1. Generator's US EPA ID No. N C D 0 7 4 5 0 5 8 5 0 5 2 0 4 2		Manifest Document No. 2		2. Page 1 of 1		Information within the blue border is not required by Federal law but may be required by State law.				
3. Generator's Name and Mailing Address Dana Container, Inc. 7254 Mount Holly Road, Charlotte, NC 28214				A. State Manifest Document Number PAE 6152042						
4. Generator's Phone (704) 399-3395				B. State Gen. ID Same						
5. Transporter 1 Company Name Maumee Express, Inc.		6. US EPA ID Number N J D 9 8 6 6 0 7 3 8 0		C. State Trans. ID PA-AH 0420						
7. Transporter 2 Company Name Maumee Express, Inc.		8. US EPA ID Number N J D 9 8 6 6 0 7 3 8 0		D. Transporter's Phone (732) 424-8441						
9. Designated Facility Name and Site Address Remtech Environmental Lewisberry, Inc. 550 Industrial Drive Lewisberry, PA 17339		10. US EPA ID Number P A D 0 6 7 0 9 8 8 2 2		E. State Trans. ID PA-AH						
				F. Transporter's Phone ()		G. State Facility's ID				
				H. Facility's Phone (717) 638-4700						
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.	
a. RQ, Hazardous Waste Liquid, n.o.s., 9, NA3082, PGIII (Trichloroethylene, Tetrachloroethylene) (FOG2, D040, D039, D033, D032, D030) (ERG#171)						x x 2	D M	x x 1 1 0	G	D039 D040 FO02
b. RQ, Waste Flammable Liquids, n.o.s., 3, UN1993, PGII (Ethanol, Varnish) (D001) (ERG#128)						x x 6	D M	x x 3 3 0	G	D001
c. RQ, Waste Flammable Liquids, n.o.s., 3, UN1993, PGII (Naphthol, Latex) (D001) (ERG#128)						x x 1	D M	x x x 5 5	G	D001
d.										
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above						
Lab Pack Physical State DCS010-A-SSM		Lab Pack Physical State DCS010-C-FWA		a. Sol		c. Sol				
a. <input type="checkbox"/> L, T E		c. <input type="checkbox"/> L, I		b. Sol		d.				
b. <input type="checkbox"/> L, I DCS010-B-FMI		d. <input type="checkbox"/>								
15. Special Handling Instructions and Additional Information a) (Carbowax/latex 70-75%, Starch, carbon sediment 20-25%, Trichloroethylene 0-1%, Tetrachloroethylene 0-1%, Methylene Chloride 0-1%, 2,4-Dinitrotoluene 0-1%, Hexachlorobenzene 0-1%, Hexachloro-1,3-Butadiene 0-1%, Speedi-dry 0-10%) Also: D033, D032, D030 b) (Ink 50-70%, Varnish 20-40%, Ethanol 5-40%) c) (Naphthol 20-40%, Latex 20-40%, Oil based dye 20-40%)										
Emergency Contact 1-800-243-3452 Plate#										
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. 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.										
Printed/Typed Name James E Adams				Signature <i>James E Adams</i>		MONTH DAY YEAR 10 3 06 1998				
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name CHUCK SPENCER				Signature <i>Chuck Spencer</i>		MONTH DAY YEAR 10 3 06 1998				
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Edward J. Hopkins				Signature <i>Edward J. Hopkins</i>		MONTH DAY YEAR 10 3 17 1998				
19. Discrepancy Indication Space Ed F) Same as C&P										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest, except as noted in item 19.										
Printed/Typed Name Rita Black				Signature <i>Rita Black</i>		MONTH DAY YEAR 10 3 12 1998				
James E. Adams				James E. Adams		10 3 10 1998				

PAE 6152042

6

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.

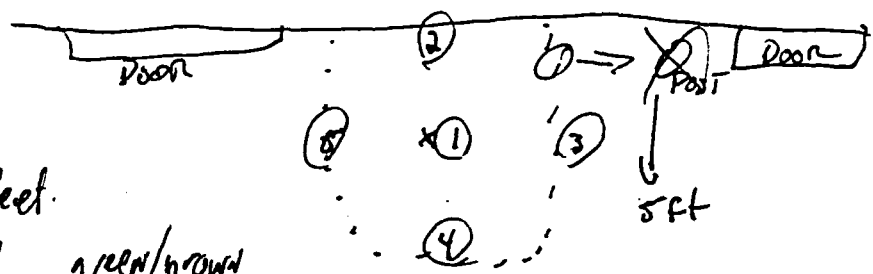
Once the samples were taken, I left the site. Facility personnel indicated that they would forward the results of the sample analysis to the Raleigh Office when they become available.

ACTIVITY TYPE: CHECK MOST APPROPRIATE

- | | |
|---|-----------------|
| 1. COMPLAINT | 5. PRESENTATION |
| 2. SPILL | 6. TRAINING |
| 3. TECHNICAL ASSISTANCE | 7. MEETING |
| 4. REMEDIAL ACTION
(other than WPCA) | 8. SAMPLING - x |

Sampling - DATA TRANSPORT

(FB)



1. Middle sample 7-7 1/2 feet.
change between 6-7 green/brown
odor 9:51
2. 12 inches from building
3 ft. down - 10:05
Soil - light orange
3. 5 ft from post (metal) 8-9 ft from Bldg.
3 ft down. 10:15
4. 18 ft from Building
red rocky 3 ft. 10:35
5. 9 ft from Building 10:48
red/rocky odor

**GEO-ENVIRONMENTAL CONSULTANTS, INC.**

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

FACSIMILE TRANSMISSION

FAX TO: Joe S. Parker DATE: 11/30/99
COMPANY: UCDENE FAX NO: 663-6040
FROM: Colleen S. Bay TOTAL PAGES: 30
PROJECT#: 99187 (Including Cover Sheet)
RE: Laboratory Results for the Dana Transport Facility for Host Brothers, Charlotte, NC

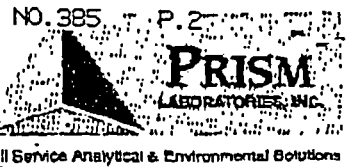
MESSAGE:

PRINCIPAL'S INITIALS per SDI

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

Lab Report



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11/19/1999

Page 1 of 4

Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

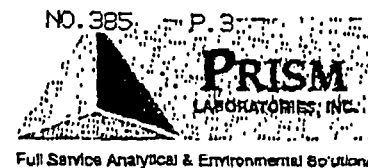
Customer Project ID: 99187
 Customer Sample ID: WS
 Prism Sample ID: AB47644
 Login Group: 3593F1
 Sample Collection Date/Time: 11/5/1999 14:00
 Lab Submittal Date/Time: 11/5/1999 14:25

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
TICs BY SEMIVOLATILE GC/MS				625/8270	11/11/1999 00:34	HWC
625/8270 Tentatively Identified Compounds (10-largest TICs):						
<Identification Class>	<Closest Spectral Fit>	<Est. Conc.>				
=====	=====	=====				
Unknown	(Tetrachloroethylene)	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 601/602	11/18/1999 10:03	DR2
CHLOROBENZENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
CHLOROETHANE	Not detected	ug/L	5	EPA 601/602	11/18/1999 10:03	DR2
CHLOROFORM	0.19 1.0	ug/L	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-DICHLOROBENZENE	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	EPA 601/602	11/18/1999 10:03	DR2
1,1-DICHLOROETHANE	70 V 1.7	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
1,2-DICHLOROETHANE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
1,1-DICHLOROETHENE	Not detected	ug/L	1	EPA 601/602	11/18/1999 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-DICHLOROPROPENE	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	DR2
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	1	EPA 601/602	11/18/1999 10:03	DR2
TETRACHLOROETHENE	0.7 9.6	ug/L	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 10:03	DR2

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

Lab Report



11/19/1999
 Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

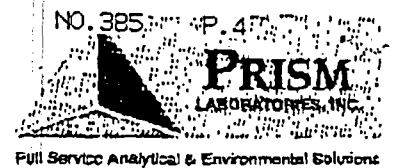
Customer Project ID: 99187
 Customer Sample ID: WS
 Prism Sample ID: AB47644
 Login Group: 3593F1
 Sample Collection Date/Time: 11/5/1999 14:00
 Lab Submittal Date/Time: 11/5/1999 14:25

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
1,1,2-TRICHLOROETHANE	Not detected	ug/L	1	EPA 601/602	11/18/1999 10:03	DR2
TRICHLOROETHENE	2.8	ug/L	3.04	EPA 601/602	11/18/1999 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	ug/L	1	EPA 601/602	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(GH)PERYLENE	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	HWC
BIS(2-CHLOROETHOXY)METHANE	Not detected	ug/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 00:34	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	Not detected	ug/L	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. 4D2 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37735 - FL Certification N. E87519

Lab Report



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
4-CHLOROPHENYL PHENYL ETHER	Not detected	ug/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 625	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	ug/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	HWC
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	HWC
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	ug/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	10	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	HWC
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

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

Lab Report



11/19/1999
 Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

Page 4 of 4

Customer Project ID: 99187
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 Sample Collection Date/Time: 11/5/1999 14:00
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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 00:34	HWC
PHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	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	11/11/1999 00:34	HWC
2,4,6-TRICHLOROPHENOL	Not detected	ug/L	10	EPA 625	11/11/1999 00:34	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

CHAIN OF CUSTODY RECORD

PAGE 1 OF 1 QUOTE #

449 Springbrook Road ▲ Charlotte, NC 28217
 P.O. Box 240543 ▲ Charlotte, NC 28224-0543
 Phone: 704/529-6364 ▲ Fax: 704/525-0409

PRESS DOWN FIRMLY - 3 COPIES

REPORT TO: Name Callleen S. Bay
 Address _____
 BILL TO: Name _____
 Address _____
 Requested Due Date _____

LAB USE ONLY			
	YES	NO	N/A
Sample INTACT upon arrival?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Received ON WET ICE? Temp _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PROPER PRESERVATIVES indicated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Received WITHIN HOLDING TIMES?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CUSTODY SEAL INTACT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VOLATILES rec'd W/OUT HEADSPACE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PROPER CONTAINERS used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

State Certification Requested NC SC _____ Other _____ NA _____
 Water Chlorinated Yes _____ No NA
 Sample Iced Upon Collection Yes No _____



Full Service Analytical & Environmental Solutions

Client GCI
 Physical Address 11704 Reamer Rd.
Charlotte, NC
 Phone 596-8718 Fax 596-8770
 P.O./Billing Reference 99187
 Project Name _____

(SEE REVERSE SIDE FOR RUSH TURNAROUND FEES)

CLIENT SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED MILITARY HOURS	MATRIX (SOIL, WATER OR SLUDGE)	SAMPLE CONTAINER			PRESERVATIVES	ANALYSES REQUESTED			REMARKS	SUB LAB CERT. ID NO.	PRISM LAB ID NO.
				*TYPE SEE BELOW	NO.	SIZE		8260	8270	9071			
SB-1	11/5/99	9:50	Soil	G	2	2TBHL	N/A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47637
SB-2	↓	10:05	↓	↓	↓	↓	↓	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47638
SB-3	↓	10:15	↓	↓	↓	↓	↓	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47639
SB-4	↓	10:36	↓	↓	↓	↓	↓	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47640
SB-5	↓	10:48	↓	↓	↓	↓	↓	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47641

Sampler's Signature Callleen S. Bay Sampled By (Print Name) COLLEEN S. BAY Affiliation _____

Relinquished By: (Signature) <u>Callleen S. Bay</u>	Received By: (Signature) _____	Date _____	Military Hours _____
Relinquished By: (Signature) _____	Received By: (Signature) _____	Date _____	Military Hours _____
Relinquished By: (Signature) _____	Received For Prism Laboratories By: <u>[Signature]</u>	Date <u>11/5/99</u>	Military Hours <u>1155</u>
Method of Shipment _____		Log-In Group No. <u>2591185</u>	

Additional Comments

NPDES NC _____ UST: NC _____ GROUNDWATER: NC _____ DRINKING WATER: NC _____ SOLID WASTE: NC _____ OTHER: NC
 SC _____ SC _____ SC _____ SC _____ SC _____ SC _____
 OTHER _____ OTHER _____ OTHER _____ OTHER _____

*CONTAINER TYPE CODES: A = Amber C = Clear G = Glass P = Plastic TL = Teflon-Lined Cap VOA = Volatile Organics Analysis (Zero Head Space)

SEE REVERSE FOR TERMS & CONDITIONS

FINAL REPORT COPY

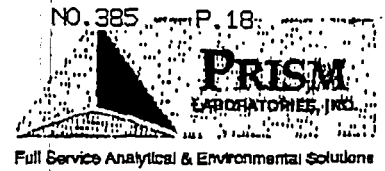
NOV. 30. 1999 11:16AM

7045968770

NO. 325

P. 17

Lab Report



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11/19/99
 Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

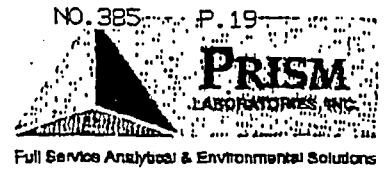
Customer Project ID: 99187
 Customer Sample ID: SB-1
 Prism Sample ID: AB47637
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 09:50
 Lab Submittal Date/Time: 11/5/99 11:55

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 3560	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	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
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 780	62	SW846-8260	11/11/99 15:57	MP
SEC-BUTYLBENZENE	170	ug/kg 180	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	ug/kg 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	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-DIBROMO-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-DICHLOROBENZENE	Not detected	ug/kg	62	SW846-8260	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

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

Lab Report



11/19/99

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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

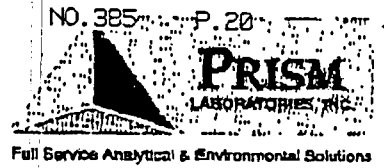
Customer Project ID: 99187
 Customer Sample ID: SB-1
 Prism Sample ID: AB47637
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 09:50
 Lab Submittal Date/Time: 11/5/99 11:55

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	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	62	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	290	ug/kg	62	SW846-8260	11/11/99 15:57	MP
HEXACHLOROBUTADIENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
ISOPROPYLBENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
P-ISOPROPYLTOLUENE	330	ug/kg	62	SW846-8260	11/11/99 15:57	MP
METHYLENE CHLORIDE	Not detected	ug/kg	1240	SW846-8260	11/11/99 15:57	MP
NAPHTHALENE	110	ug/kg	62	SW846-8260	11/11/99 15:57	MP
N-PROPYLBENZENE	100	ug/kg	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 16:57	MP
1,1,2,2-TETRACHLOROETHANE	Not detected	ug/kg	62	SW846-8260	11/11/99 16:57	MP
TETRACHLOROETHENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
TOLUENE	67	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2,3-TRICHLOROENZENE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2,4-TRICHLOROENZENE	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 15:57	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	MP
1,2,3-TRICHLOROPROPANE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,2,4-TRIMETHYLBENZENE	540	ug/kg	62	SW846-8260	11/11/99 15:57	MP
1,3,5-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	SW846-8260	11/11/99 15:57	MP
2-BUTANONE (MEK)	Not detected	ug/kg	620	SW846-8260	11/11/99 15:57	MP

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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

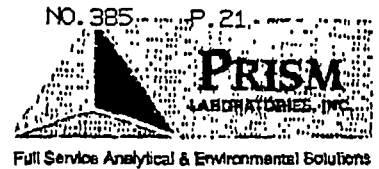
Customer Project ID: 99187
 Customer Sample ID: SB-1
 Prism Sample ID: AB47637
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 09:50
 Lab Submittal Date/Time: 11/5/99 11:55

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	SW846-8260	11/11/99 15:57	MP
4-METHYL-2-PENTANONE (MIBK)	Not detected	ug/kg	620	SW846-8260	11/11/99 15:57	MP
ACETONE	Not detected	ug/kg	1240	SW846-8260	11/11/99 15:57	MP
CARBON DISULFIDE	Not detected	ug/kg	1240	SW846-8260	11/11/99 15:57	MP
VINYL ACETATE	Not detected	ug/kg	620	SW846-8260	11/11/99 15:57	MP
CIS-1,3-DICHLOROPROPENE	Not detected	ug/kg	62	SW846-8260	11/11/99 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
IPE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
MTBE	Not detected	ug/kg	62	SW846-8260	11/11/99 15:57	MP
SURR:DIBROMOFLUOROMETHANE	129	%	70-130	SW846-8260	11/11/99 15:57	MP
SURR:TOLUENE-D8	119	%	70-130	SW846-8260	11/11/99 15:57	MP
SURR:BROMOFLUOROBENZENE	91	%	70-130	SW846-8260	11/11/99 15:57	MP
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	HWC
Benzidine	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Benzo (a) anthracene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Benzo (a) pyrene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Benzo (b) fluoranthene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Benzo (ghi) 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	HWC
Bis(2-chloroethyl) ether	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Bis(2-chloroisopropyl) ether	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Bis(2-ethylhexyl) phthalate	440	ug/kg	6670	SW846-8270	11/12/99 14:08	HWC
4-Bromophenyl phenyl ether	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
Butyl benzyl phthalate	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
2-Chloronaphthalene	Not detected	ug/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

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37735 - FL Certification N. EB7519

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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
 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	410	SW846-8270	11/12/99 14:08	HWC
1,2-Dichlorobenzene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
1,3-Dichlorobenzene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
1,4-Dichlorobenzene	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
3,3-Dichlorobenzidine	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
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	HWC
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	HWC
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	HWC
N-nitroso-di-n-propylamine	Not detected	ug/kg	410	SW846-8270	11/12/99 14:08	HWC
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
Pyrene	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

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Geo-Environmental Consultante
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

Customer Project ID: 99187
 Customer Sample ID: SE-1
 Prism Sample ID: AB47637
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 09:50
 Lab Submittal Date/Time: 11/5/99 11:55

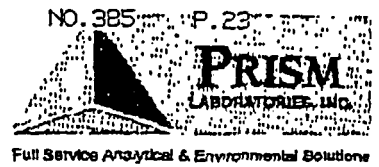
The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

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

Angela D. Overcash, V.P. Laboratory Services

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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
PREP. METHOD 3550	Completed				11/10/99 08:00	JDP
CALCULATIONS BASED ON DRY WT.	76	% DRY WT.	0.01	SM 2540 G	11/09/99 10:15	GAM
SW846 - 9071 TPH OIL AND GREASE	100	mg/kg <i>200</i>	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	SW846-8260	11/11/99 16:45	MP
BROMOFORM	Not detected	ug/kg	7.0	SW846-8260	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	ug/kg	7.0	SW846-8260	11/11/99 16:45	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	SW846-8260	11/11/99 16:45	MP
2-CHLOROTOLUENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
4-CHLOROTOLUENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,2-DIBROMO-3-CHLOROPROPANE	Not detected	ug/kg	14.0	SW846-8260	11/11/99 16:45	MP
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 detected	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	SW846-8260	11/11/99 16:45	MP
DICHLORODIFLUOROMETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,1-DICHLOROETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,2-DICHLOROETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,1-DICHLOROETHENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP

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

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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

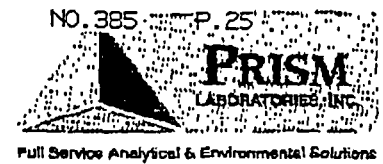
Customer Project ID: 99187
 Customer Sample ID: SB-2
 Prism Sample ID: AB47638
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 10:05
 Lab Submittal Date/Time: 11/5/99 11:55

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
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	SW846-8260	11/11/99 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	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,1-DICHLOROPROPENE	Not detected	ug/kg	7.0	SW846-8260	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	7.0	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	11/11/99 16:45	MP
NAPHTHALENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 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	SW846-8260	11/11/99 16:45	MP
1,1,1,2-TETRACHLOROETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
1,1,2,2-TETRACHLOROETHANE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
TETRACHLOROETHENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
TOLUENE	Not detected	ug/kg	7.0	SW846-8260	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	ug/kg	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
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 detected	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-TRIMETHYLBENZENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
VINYL CHLORIDE	Not detected	ug/kg	14.0	SW846-8260	11/11/99 16:45	MP
TOTAL XYLENES	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
2-BUTANONE (MEK)	Not detected	ug/kg	70.0	SW846-8260	11/11/99 16:45	MP

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

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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28289

Customer Project ID: 99187
 Customer Sample ID: SB-2
 Prism Sample ID: AB47638
 Login Group: 9591F5
 Sample Collection Date/Time: 11/5/99 10:05
 Lab Submittal Date/Time: 11/5/99 11:55

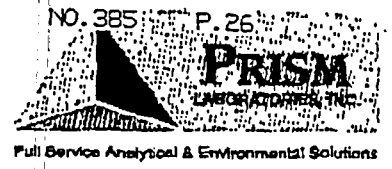
The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
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	11/11/99 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	11/11/99 16:45	MP
VINYL ACETATE	Not detected	ug/kg	70.0	SW846-8260	11/11/99 16:45	MP
CIS-1,3-DICHLOROPROPENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
TRANS-1,3-DICHLOROPROPENE	Not detected	ug/kg	7.0	SW846-8260	11/11/99 16:45	MP
2-HEXANONE	Not detected	ug/kg	70.0	SW846-8260	11/11/99 16:45	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:DIBROMOFLUOROMETHANE	84	%	70-130	SW846-8260	11/11/99 16:45	MP
SURR:TOLUENE-DB	107	%	70-130	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	HWC
Benzidine	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
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 (ghi) perylene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Benzo (k) fluoranthene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Bis(2-chloroethoxy) methane	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Bis(2-chloroethyl) ether	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Bis(2-chloroisopropyl) ether	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Bis(2-ethylhexyl) phthalate	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
4-Bromophenyl phenyl ether	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Ethyl 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-Chlorophenyl phenyl ether	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Chrysene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC

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

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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

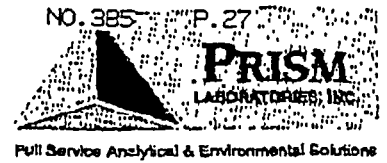
Customer Project ID: 99187
 Customer Sample ID: SB-2
 Prism Sample ID: AB47638
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 10:05
 Lab Submittal Date/Time: 11/5/99 11:55

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	SW846-8270	11/12/99 14:53	HWC
1,3-Dichlorobenzene	Not detected	ug/kg	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	SW846-8270	11/12/99 14:53	HWC
Diethyl phthalate	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Dimethyl phthalate	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Di-n-butyl phthalate	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
2,4-Dinitrotoluene	Not detected	ug/kg	430	SW846-8270	11/12/99 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	1300	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Fluorene	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Hexachlorobenzene	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	HWC
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-di-n-propylamine	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
N-nitrosodiphenylamine	Not detected	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Phenanthrene	1600	ug/kg	430	SW846-8270	11/12/99 14:53	HWC
Pyrene	840	ug/kg	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
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28268

Customer Project ID: 99187
 Customer Sample ID: SB-2
 Prism Sample ID: AB47638
 Login Group: 9591F5
 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
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Sample Comments:

Angela D. Overcash, V.P. Laboratory Services

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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 250	10	SW-846 #9071	11/9/99 11:30	LAC
BENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
BROMOBENZENE	Not detected	ug/kg	6.0	SW846-8260	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	SW846-8260	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	6.0	SW846-8260	11/11/99 17:57	MP
SEC-BUTYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
TERT-BUTYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
CARBON TETRACHLORIDE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
CHLORO BENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
CHLORODIBROMOMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
CHLOROETHANE	Not detected	ug/kg	12.0	SW846-8260	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	MP
2-CHLOROTOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
4-CHLOROTOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
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	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,2-DICHLORO BENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,3-DICHLORO BENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,4-DICHLORO BENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
DICHLORODIFLUOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,1-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,2-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	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
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28259

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

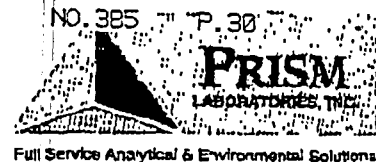
The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
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	11/11/99 17:57	MP
1,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,3-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
2,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,1-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 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	6.0	SW846-8260	11/11/99 17:57	MP
METHYLENE CHLORIDE	Not detected	ug/kg	120.0	SW846-8260	11/11/99 17:57	MP
NAPHTHALENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
N-PROPYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
STYRENE	Not detected	ug/kg	6.0	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	ug/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	11/11/99 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 detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
TRICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
TRICHLOROFLUOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
1,2,3-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	6.0	SW846-8260	11/11/99 17:57	MP
2-BUTANONE (MEK)	Not detected	ug/kg	80.0	SW846-8260	11/11/99 17:57	MP

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37735 - FL Certification N. E07519

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Lab Report



11/19/99
 Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

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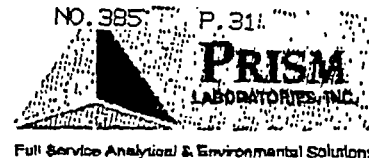
Customer Project ID: 99187
 Customer Sample ID: SB-3
 Prism Sample ID: AB47639
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 10:15
 Lab Submittal Date/Time: 11/5/99 11:55

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
2-CHLOROETHYL VINYL ETHER	Not detected	ug/kg	12.0	SW846-8260	11/11/99 17:57	MP
4-METHYL-2-PENTANONE (MIBK)	Not detected	ug/kg	60.0	SW846-8260	11/11/99 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	SW846-8260	11/11/99 17:57	MP
VINYL ACETATE	Not detected	ug/kg	60.0	SW846-8260	11/11/99 17:57	MP
CIS-1,3-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
TRANS-1,3-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	11/11/99 17:57	MP
IPE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
MTBE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 17:57	MP
SURR: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 17:16	HWC
Benzidine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Benzo (a) anthracene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Benzo (a) pyrene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Benzo (b) fluoranthene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Benzo (ghi) perylene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Benzo (k) fluoranthene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Bis(2-chloroethoxy) methane	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Bis(2-chloroethyl) 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	11/12/99 17:16	HWC
Bis(2-ethylhexyl) phthalate	3100	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
4-Bromophenyl phenyl 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-Chlorophenyl 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

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

Lab Report



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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

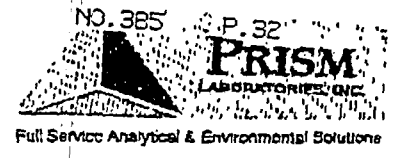
Customer Project ID: 99187
 Customer Sample ID: SB-3
 Prism Sample ID: AB47639
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 10:15
 Lab Submittal Date/Time: 11/5/99 11:55

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
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-Dichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
3,3-Dichlorobenzidine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Diethyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Dimethyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Di-n-butyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
2,4-Dinitrotoluene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
2,6-Dinitrotoluene	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	HWC
Hexachlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Hexachlorobutadiene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Hexachlorocyclopentadiene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Hexachloroethane	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Indeno(1,2,3-cd) pyrene	Not detected	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 17:16	HWC
Nitrobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
N-nitrosodimethylamine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
N-nitroso-di-n-propylamine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
N-nitrosodiphenylamine	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Phenanthrene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
Pyrene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC
1,2,4-Trichlorobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 17:16	HWC

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11/19/99
Geo-Environmental Consultants
Dave Stoner
11704 Reames Road
Charlotte, NC 28269

Customer Project ID: 99167
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:

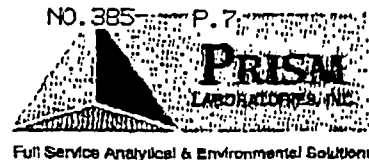
TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
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Sample Comments:

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

Angela D. Overcash, V.P. Laboratory Services

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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

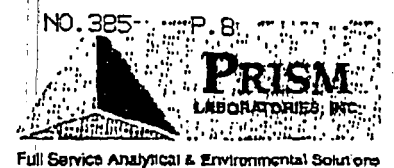
Customer Project ID: 99187
 Customer Sample ID: SB-4
 Prism Sample ID: AB47640
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 10:36
 Lab Submittal Date/Time: 11/5/99 11:55

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
PREP. METHOD 3550	Completed				11/10/99 08:00	JDP
CALCULATIONS BASED ON DRY WT.	79	% DRY WT.		SM 2540 G	11/9/99 10:16	GAM
SW846 - 8071 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	6.0	SW846-8260	11/11/99 18:39	MP
BROMOCHLOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
BROMODICHLOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
BROMOFORM	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	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 18:39	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	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
CHLOROETHANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 18:39	MP
CHLOROFORM	Not detected	ug/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
1,2-DIBROMO-3-CHLOROPROPANE	Not detected	ug/kg	12.0	SW846-8260	11/11/99 18:39	MP
1,2-DIBROMOETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
DIBROMOMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,2-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,3-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,4-DICHLOROETHANE	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 18:39	MP
1,1-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	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

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 57795 - FL Certification N. E67519

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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

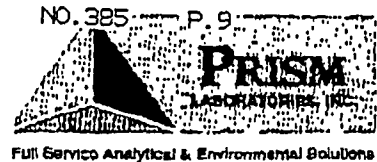
Customer Project ID: 99187
 Customer Sample ID: SB-4
 Prism Sample ID: AB47640
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 10:36
 Lab Submittal Date/Time: 11/5/99 11:55

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
CIS-1,2-DICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
TRANS-1,2-DICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
1,3-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	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 18:39	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 18:39	MP
ISOPROPYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
P-ISOPROPYLTOLUENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
METHYLENE CHLORIDE	Not detected	ug/kg	120.0	SW846-8260	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 18:39	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	SW846-8260	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	6.0	SW846-8260	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	SW846-8260	11/11/99 18:39	MP
TRICHLOROETHENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
TRICHLOROFUOROMETHANE	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/kg	12.0	SW846-8260	11/11/99 18:39	MP
TOTAL XYLENES	Not detected	ug/kg	6.0	SW846-8260	11/11/99 18:39	MP
2-BUTANONE (MEK)	Not detected	ug/kg	60.0	SW846-8260	11/11/99 18:39	MP

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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

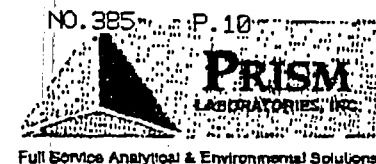
The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

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	SW846-8260	11/11/99 18:39	MP
ACETONE	Not detected	ug/kg	120.0	SW846-8260	11/11/99 18:39	MP
CARBON DISULFIDE	Not detected	ug/kg	120.0	SW846-8260	11/11/99 18:39	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	8.0	SW846-8260	11/11/99 18:39	MP
2-HEXANONE	Not detected	ug/kg	60.0	SW846-8260	11/11/99 18:39	MP
IPE	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 18:39	MP
SURR:DIBROMOFLUOROMETHANE	93	%	70-130	SW846-8260	11/11/99 18:39	MP
SURR:TOLUENE-D8	117	%	70-130	SW846-8260	11/11/99 18:39	MP
SURR:BROMOFLUOROBENZENE	103	%	70-130	SW846-8260	11/11/99 18:39	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	SW846-8270	11/12/99 18:01	HWC
Benzo (ghi) perylene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Benzo (k) fluoranthene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Bis(2-chloroethoxy) methane	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Bis(2-chloroethyl) ether	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Bis(2-chloroisopropyl) ether	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Bis(2-ethylhexyl) phthalate	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
4-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
2-Chloronaphthalene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
4-Chlorophenyl 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. E87518

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Geo-Environmental Consultants
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 11704 Reames Road
 Charlotte, NC 28269

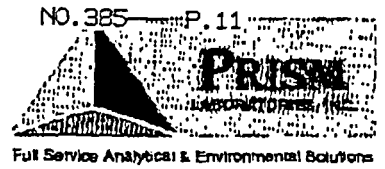
Customer Project ID: 99187
 Customer Sample ID: SB-4
 Prism Sample ID: AB47640
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 10:36
 Lab Submittal Date/Time: 11/5/99 11:55

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
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	SW846-8270	11/12/99 18:01	HWC
1,3-Dichlorobenzene	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 18:01	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	HWC
Di-n-butyl phthalate	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
2,4-Dinitrotoluene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
2,6-Dinitrotoluene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	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
Fluorathene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Fluorene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Hexachlorobenzene	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
Hexachlorocyclopentadiene	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
Indeno(1,2,3-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
Naphthalene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
Nitrobenzene	Not detected	ug/kg	2100	SW846-8270	11/12/99 18:01	HWC
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-nitrosodiphenylamine	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	HWC

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37795 - FL Certification N. E67519

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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:

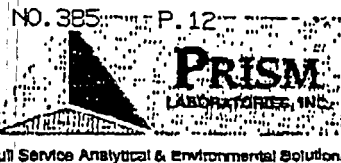
TEST PARAMETER	TEST RESULT	UNITS	MDL	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
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Sample Comments:

Analysis note for 8270: Sample MDL 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 28268

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.	0.01	SM 2540 G	11/9/99 10:15	GAM
SW846 - 9071 TPH OIL AND GREASE	300	mg/kg 1250	10	SW-846 #9071	11/9/99 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	ug/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 19:20	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 19:20	MP
1,2-DIBROMO-3-CHLOROPROPANE	Not detected	ug/kg	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	SW846-8260	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 detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,4-DICHLOROBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
DICHLORODIFLUOROMETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,1-DICHLOROETHANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,2-DICHLOROETHANE	Not detected	ug/kg	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

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

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Geo-Environmental Consultants
 Dave Stoner
 11704 Reames Road
 Charlotte, NC 28269

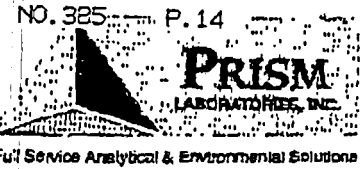
Customer Project ID: 99187
 Customer Sample ID: SB-5
 Prism Sample ID: AB47641
 Login Group: 3591F5
 Sample Collection Date/Time: 11/5/99 10:48
 Lab Submittal Date/Time: 11/5/99 11:55

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
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	SW846-8260	11/11/99 19:20	MP
1,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
1,3-DICHLOROPROPANE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
2,2-DICHLOROPROPANE	Not detected	ug/kg	6.0	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	SW846-8260	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	SW846-8260	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
1,2,3-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	MP
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	11/11/99 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	SW846-8260	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-TRIMETHYLBENZENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
VINYL CHLORIDE	Not detected	ug/kg	12.0	SW846-8260	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	ug/kg	60.0	SW846-8260	11/11/99 19:20	MP

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

Lab Report



11/19/99
 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
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	SW846-8260	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-1,3-DICHLOROPROPENE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	MP
2-HEXANONE	Not detected	ug/kg	60.0	SW846-8260	11/11/99 19:20	MP
IPE	Not detected	ug/kg	6.0	SW846-8260	11/11/99 19:20	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

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 detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Benzo (a) anthracene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Benzo (a) pyrene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Benzo (b) fluoranthene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Benzo (ghi) perylene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Benzo (k) fluoranthene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Bis(2-chloroethoxy) methane	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Bis(2-chloroethyl) ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Bis(2-chloroisopropyl) ether	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
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 phthalate	Not detected	ug/kg	2000	SW846-8270	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

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37735 - FL Certification N. EB7519

Lab Report



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
Dibenzo (a,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	HWC
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 18:46	HWC
Diethyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Dimethyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Di-n-butyl phthalate	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
2,4-Dinitrotoluene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
2,6-Dinitrotoluene	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 18:46	HWC
Hexachlorobutadiene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Hexachlorocyclopentadiene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Hexachloroethane	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Indeno(1,2,3-cd) pyrene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Isophorone	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Naphthalene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
Nitrobenzene	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
N-nitrosodimethylamine	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
N-nitroso-di-n-propylamine	Not detected	ug/kg	2000	SW846-8270	11/12/99 18:46	HWC
N-nitrosodiphenylamine	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

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

11/19/99

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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
-------------------	----------------	-------	-----	---------------------	----------------------	---------

Sample Comments:

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

Angela D. Overcash, V.P. Laboratory Services



Full Service Analytical & Environmental Solutions

CHAIN OF CUSTODY RECORD

PAGE 1 OF 1 QUOTE # _____

449 Springbrook Road ▲ Charlotte, NC 28217
P.O. Box 240543 ▲ Charlotte, NC 28224-0543
Phone: 704/529-6364 ▲ Fax: 704/525-0409

PRESS DOWN FIRMLY - 3 COPIES

Client GCI
Physical Address 11704 Reamers Rd
Charlotte, NC
Phone 596-8218 Fax 596-8770
P.O. #/Billing Reference 99187
Project Name _____

REPORT TO: Name Calleen S Bay
Address _____
BILL TO: Name _____
Address _____
Requested Due Date _____

LAB USE ONLY		YES	NO	N/A
Samples INTACT upon arrival?	<input checked="" type="checkbox"/>			
Received ON WET ICE? Temp _____	<input checked="" type="checkbox"/>			
PROPER PRESERVATIVES indicated?	<input checked="" type="checkbox"/>			
Received WITHIN HOLDING TIMES?	<input checked="" type="checkbox"/>			
CUSTODY SEALS INTACT?	<input checked="" type="checkbox"/>			
VOLATILES WITH/OUT HEADSPACE?	<input checked="" type="checkbox"/>			
PROPER CONTAINERS used?	<input checked="" type="checkbox"/>			

State Certification Requested NC SC Other NA
Water Chlorinated Yes No NA
Sample Iced Upon Collection Yes No

(SEE REVERSE SIDE FOR RUSH TURNAROUND FEES)

CLIENT SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED MILITARY HOURS	MATRIX (SOIL, WATER OR SLUDGE)	SAMPLE CONTAINER			PRESERVATIVES	ANALYSES REQUESTED			REMARKS	SUB LAB CERT. ID NO.	PRISM LAB ID NO.
				TYPE SEE BELOW	NO.	SIZE		8260	8270	9071			
SB-1	11/5/99	9:50	Soil	G	2	250ML	N/A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47637
SB-2	↓	10:05	↓	↓	↓	↓	↓	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47638
SB-3	↓	10:15	↓	↓	↓	↓	↓	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47639
SB-4	↓	10:36	↓	↓	↓	↓	↓	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47640
SB-5	↓	10:48	↓	↓	↓	↓	↓	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			47641

Sampler's Signature Calleen S Bay Sampled By (Print Name) COLLEEN S BAY Affiliation _____

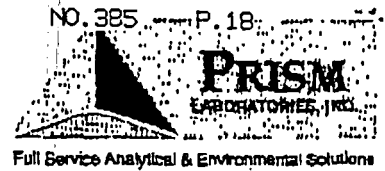
Relinquished By: (Signature) <u>Calleen S Bay</u>	Received By: (Signature) _____	Date _____	Military Hours _____
Relinquished By: (Signature) _____	Received By: (Signature) _____	Date _____	Military Hours _____
Relinquished By: (Signature) _____	Received For Prism Laboratories By: <u>Prism Lab</u>	Date <u>11/5/99</u>	Military Hours <u>1155</u>
Method of Shipment _____		Log-In Group No. <u>359115</u>	

Additional Comments _____

NPDES NC _____ UST: NC _____ GROUNDWATER: NC _____ DRINKING WATER: NC _____ SOLID WASTE: NC _____ OTHER: NC
SC _____ SC _____ SC _____ SC _____ SC _____ SC _____
OTHER _____ OTHER _____ OTHER _____ OTHER _____ OTHER _____ OTHER _____

NOV 30 1999 11:16AM 7045969770 NO. 335 P. 17

Lab Report



RECEIVED NOV 23 1999

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11/19/99
 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
 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.	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
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	62	SW846-8260	11/11/99 15:57	MP
SEC-BUTYLBENZENE	170	ug/kg	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
CHLOROENZENE	180	ug/kg	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	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-DIBROMO-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-DICHLOROBENZENE	Not detected	ug/kg	62	SW846-8260	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

NC Certification No. 402 - SC Certification No. 99012 - NC Drinking Water Cert. No. 37735 - FL Certification N. EB7519

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 Parker
 Representing The Tomlin Group

Guidelines for Access:

The staff of the Mooresville Regional Office is dedicated to making public records, in our custody, readily available to the public for review and copying. We also have the responsibility to the public, to safeguard these records, and to carry out our day-to-day program obligations. Please read carefully, the following guidelines before signing this form:

1. We prefer that you call at least a day in advance to schedule an appointment to review the files. Appointments will be scheduled between 9:00 am and 4:00 pm. Viewing time ends at 5:00 pm. Anyone arriving without an appointment may view the files to the extent that time and staff supervision is available.
2. You must specify the files you want to review by facility names. The number of files that you may review at one time will be limited to five (5).
3. You may make copies of a file when the copier is not in use by the staff, and if time permits. Access to the copy machine may be limited after 2:00 pm, due to heavy staff use. Cost per copy is ten (10) cents; payment may be made by check, money order, or cash at the reception desk. Checks should be made payable to the Dept. of Environment, Health, and Natural Resources, or DEHNR.
4. **FILES MUST BE KEPT IN THE ORDER YOU FOUND THEM.** Files may not be taken from the State office. To remove, alter, deface, mutilate, or destroy material in one of these files is a misdemeanor for which you can be fined up to \$ 500.00.

<u>Facility Name</u>	<u>County</u>
1. Jones Chemical	Mecklenburg
2. Waycross Paper	"
3. Livingston Coatings	"
4. All Waste Container Services	"
5. Haver Materials Handling Group, Inc	"
6. Mast Bros. Tank Cleaning Woody Parker / Tomlin Group	
Signature & Name of Firm/ Business	Date

Time In/ Time Out

- (Please Attach a Business Card to This Form)
7. CENTRAL TRANSPORT
 8. Kysor Michigan Fleet
 9. Continental Industrial
 10. APS, Inc
 11. Dana Transport

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT



JANUARY 29, 1998

JAMES B. HUNT JR.
GOVERNOR

WAYNE McDEVITT
SECRETARY

WILLIAM L. MEYER
DIRECTOR

Mr. Daniel J. Bonanni
Director
Dana Transportation, Inc.
210 East Essex Ave.
Avenel, NJ 07001

RE: Dana Transport, Inc.
NCD074505850



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



London - FYI
Buro
2/25/97

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 Purchasing 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, Microbac 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

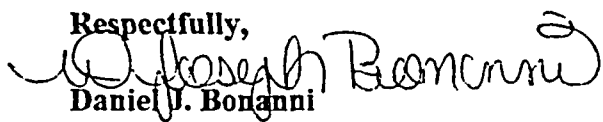
H. **AOC 8**-On-site water retention, namely, behind wash bay area collects surface waters and retains same. According to facility staff, construction quotes have been provided to Corporate Purchasing and Corporate to address surface area depressions. Furthermore, Mr. Jones, Cooper Environmental has 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 J. Bonanni

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
Mooreville 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

DRAFT

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 Mecklenburg Co., North Carolina. Dana Transport, Inc. is a tank cleaning operation which generates D001 and D008 hazardous waste at its facility.
6. 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 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 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 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 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 .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 on-site for 90 days or less without a permit or without having interim status, provided that while being accumulated on-site, 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 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 .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:

- (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. 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 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 consideration of each of the factors above, penalties are assessed as follows: A. _____ ; B. _____; C. _____ ; D. _____ ; E. _____; F. _____ ; and G. _____;. Accordingly, a total penalty is imposed 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:

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 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 _____ day of _____, 1996.

William L. Meyer, Director
Division of Solid Waste Management

Is your RETURN ADDRESS completed on the reverse side?

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 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.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

MR ROBERT HAYES
 DANA TRANSPORT, INC.
 7254 MOUNT HOLLY ROAD
 CHARLOTTE NC 28214
 NCD 745505850

4a. Article Number

431 483 951 (02/21/97)

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

2/26/97

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X *Robert C. Beaver*

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 431 483 951

US Postal Service (02/21/97)

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Mr. Robert Hayes	
Street & Number	
Dana Transport, Inc.	
Post Office, State, & ZIP Code	
7254 Mounty Holly Road	
Postage	Charlotte, NC 28214
Certified Fee (JSP)	NCD745505850
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

RCRA INSPECTION REPORT

1. FACILITY INFORMATION Dana Transport, Inc.
7254 Mt. Holly Road
Charlotte, N.C. 28214
NCD 074505850 Generator
2. FACILITY CONTACT 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. DATE OF INSPECTION 28 Jan 1997
5. PURPOSE OF INSPECTION To determine compliance with 40 CFR 262,
265, & 268.
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 occurring. 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 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 amendments 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 must 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 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) 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 emanating 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.

- Recommendations: 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.

INSPECTOR

DATE

FACILITY CONTACT

1. Make Witness/Evidence list that coincides with Compliance Order.

PENALTY COMPUTATION CHECKLIST

Facility Name/ID: DANA TRANSPORT, INC. NCD 074 505 850

ADDRESS: 7254 MT. HOLLY ROAD, CHARLOTTE, N.C. 28214

1. Number of employees at the facility. 15

2. Number of residents in the area of the facility. _____

3. Distance to residents. _____

4. Source of facility's potable water supply. Municipal Water + Sewer

5. Source of potable water supply for residents and/or other industries in the area of the facility. Municipal

6. List all violations found at the facility:

40 CFR 262.11 40 CFR 262.34(a)(9) ref. 40 CFR 265.16(d)(3) ^{JP}

40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(4) ^{JP}

40 CFR 262.34(a)(2) ref. 40 CFR 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(e)

40 CFR 262.34(a)(3) 40 CFR 262.34(a)(4) ref. 40 CFR 265.31

40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1) 40 CFR 262.34(a)(4) ref. 40 CFR 265.35

40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(2) 40 CFR 262.34(a)(4) ref. 40 CFR 265.53(b)

40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(3) 40 CFR 262.34(a)(4) ref. 40 CFR 265.54(c)

40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) 40 CFR 262.34(a)(4) ref. 40 CFR 265.54(d)

40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(1) 40 CFR 262.34(c)(1) ref. 40 CFR 265.171

40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(2) 40 CFR 262.34(c)(1) ref. 40 CFR 262.34(c)(1)(i) ^(OVER)

40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(3) 40 CFR 268.7(a)(7)

40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(4)

SPECIFIC VIOLATION(S)

①

- Regulation violated: 40 CFR 262.11
1. Unit(s) involved. (2) Two fifty-five gallon containers holding unknown material
 2. Type of waste (waste code and constituents) UNKNOWN - possible Hazardous WASTE
 3. Quantity of waste UNKNOWN - At most, 110 gallons of material
 4. Describe area in which violation occurred. (1) fifty-five gallon container in the TANK Washing Area noted as being "degreaser" and (1) fifty-five gallon container in the TOTE WASHING AREA noted as having wash in it but smelled of solvent.
 5. Specifics of violation. Both containers need a waste decontamination done on the material contained inside.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
NONE
 7. Date violation occurred? JAN 28, 1997
 8. Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

②

- Regulation violated: 40 CFR 267.34(a)(1)(i) ref. 40 CFR 265.174
1. Unit(s) involved. APRIL 5th 12-55 gallon container of H.W. in storage
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste NONE^{SP} 12-55 gallon container of H.W. in storage
 4. Describe area in which violation occurred. Both the TANK Cleaning Area and the Tote Washing Area
 5. Specifics of violation. Facility failed to perform the required weekly inspections on containers of Haz. Waste in storage
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
NONE
 7. Date violation occurred? JAN 28, 1997
 8. Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

③

- Regulation violated: 40 CFR 262.34(a)(2)
1. Unit(s) involved. 12-55 gallon containers holding haz. waste
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste 12-55 gallon containers
 4. Describe area in which violation occurred. Both Storage Areas - TANK Cleaning AREA and Tote Washing AREA
 5. Specifics of violation. HAZARDOUS WASTE CONTAINERS in storage were not marked with an accumulation start date
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
Pictures
 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)

4

- Regulation violated: 40 CFR 267.34(a)(3)
- Unit(s) involved. 1-5 gallon container holding hazardous waste
 - Type of waste (waste code and constituents) D001 - Ink Waste
 - Quantity of waste 1-5 gallon container of hazardous waste
 - Describe area in which violation occurred. this 1-5 gallon container was observed in the TOTE WASHIDE AREA without a hazardous waste label
 - Specifics of violation. 1-5 gallon container not labeled as a hazardous waste
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
Picture
 - Date violation occurred? JAN 28 1997
 - Has facility been cited for this violation in past? yes__ no
Date(s) of past violation? _____

5

- Regulation violated: 40 CFR 267.34(a)(4) ref. 40 CFR 265.16(a)(1)
- Unit(s) involved. TRAINING
 - Type of waste (waste code and constituents) D001, D008
 - Quantity of waste _____
 - Describe area in which violation occurred. PAPERWORK
 - Specifics of violation. Facility failed to develop a training program for their employees on hazardous waste management.
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
Facility could not produce a hazardous waste management training document.
 - Date violation occurred? JAN 28, 1997
 - Has facility been cited for this violation in past? yes__ no
Date(s) of past violation? _____

6

- Regulation violated: 40 CFR 267.34(a)(4) ref. 40 CFR 265.16(a)(2)
- Unit(s) involved. TRAINING
 - Type of waste (waste code and constituents) D001, D008
 - Quantity of waste _____
 - Describe area in which violation occurred. PAPERWORK
 - Specifics of violation. Facility failed to retain a person trained in hazardous waste manag. procedures to perform routine training at the facility
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
NO TRAINING Document
 - Date violation occurred? JAN 28, 1997
 - Has facility been cited for this violation in past? yes__ no
Date(s) of past violation? _____

SPECIFIC VIOLATION(S)

② Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(3)
1. Unit(s) involved. TRAINING
2. Type of waste (waste code and constituents) D008, D001
3. Quantity of waste _____
4. Describe area in which violation occurred. PAPERWORK
5. Specifics of violation. Facility failed to provide personnel with specific training in the area of emergency procedures in dealing with haz. waste
6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
No TRAINING Document
7. Date violation occurred? JAN 28, 1997
8. Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

③ Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16 (c)
1. Unit(s) involved. TRAINING
2. Type of waste (waste code and constituents) D001, D008
3. Quantity of waste _____
4. Describe area in which violation occurred. PAPERWORK
5. Specifics of violation. Facility failed to provide personnel with an annual review of their initial hazardous waste training.
6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
No TRAINING Document
7. Date violation occurred? JAN 28, 1997
8. Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

④ Regulation violated: 40 CFR 267.34(a)(4) ref. 40 CFR 265.16(d)(1)
1. Unit(s) involved. TRAINING
2. Type of waste (waste code and constituents) _____
3. Quantity of waste _____
4. Describe area in which violation occurred. PAPERWORK
5. Specifics of violation. Facility failed to list job titles for each position at the facility related to hazardous waste management.
6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
No TRAINING Document
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)

10

- Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(2)
- Unit(s) involved. TRAINING
 - Type of waste (waste code and constituents) D001, D008
 - Quantity of waste _____
 - Describe area in which violation occurred. PAPERWORK
 - Specifics of violation. FACILITY FAILED TO LIST WRITTEN JOB DESCRIPTIONS FOR EACH POSITION LISTED IN THE FACILITY'S HAZ WASTE MANAGEMENT PROGRAM
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
NO TRAINING DOCUMENT
 - Date violation occurred? JAN 28, 1997
 - Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

11

- Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(3)
- Unit(s) involved. TRAINING
 - Type of waste (waste code and constituents) D001, D008
 - Quantity of waste _____
 - Describe area in which violation occurred. PAPERWORK
 - Specifics of violation. NO WRITTEN DESCRIPTIONS OF THE TYPE AND AMOUNT OF BOTH INTRODUCTORY AND CONTINUING TRAINING THAT WILL BE GIVEN TO EACH PERSON FILING A.H.W. RES. 6/20
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
NO TRAINING DOCUMENT
 - Date violation occurred? JAN 28, 1997
 - Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

12

- Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(4)
- Unit(s) involved. TRAINING
 - Type of waste (waste code and constituents) D001, D008
 - Quantity of waste _____
 - Describe area in which violation occurred. PAPERWORK
 - Specifics of violation. NO RECORDS THE DOCUMENT TRAINING OR JOB EXPERIENCE REQUIRED UNDER PARAGRAPHS (a)(b) AND (c) HAS BEEN GIVEN TO FACILITY PERSONNEL
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
NO TRAINING DOCUMENT
 - Date violation occurred? JAN. 28, 1997
 - Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

SPECIFIC VIOLATION(S)

(13)

- Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(e)
1. Unit(s) involved. TRAINING
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste _____
 4. Describe area in which violation occurred. PAPERWORK
 5. Specifics of violation. FACILITY FAILED TO RETAIN CURRENT AND PAST PERSONNEL TRAINING RECORDS AT THE FACILITY.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
NO TRAINING DOCUMENTS
 7. Date violation occurred? JAN 28, 1997
 8. Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

(14)

- Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.31
1. Unit(s) involved. 1-5 gallon container holding haz. waste
 2. Type of waste (waste code and constituents) D001, INK WASTE
 3. Quantity of waste Approximately 3 to 4 gallons of material
 4. Describe area in which violation occurred. the five gallon container was observed in the TOTE WASHING AREA
 5. Specifics of violation. FACILITY FAILED TO THE FIVE GALLON CONTAINER WAS OBSERVED WITH RELEASES OF HAZ WASTE ON THE SIDES OF THE CONTAINER.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
RELEASES WERE LIMITED TO THE SIDES OF THE CONTAINER - PICTURE
 7. Date violation occurred? JAN 28, 1997
 8. Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

(15)

- Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.35
1. Unit(s) involved. 17-55 gallon containers holding hazardous waste
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste 17-55 gallon containers
 4. Describe area in which violation occurred. TWO AREAS - SIX CONTAINERS IN TANK CLEANING AREA AND SIX CONTAINERS IN THE TOTE WASHING AREA
 5. Specifics of violation. FACILITY FAILED TO PROVIDE A SUFFICIENT AMOUNT OF GROUND SPACE FOR CONTAINERS OF HAZARDOUS WASTE IN STORAGE
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
PICTURES OF BOTH AREAS
 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)

16

- Regulation violated: 40 CFR 262.34(a)(4) ref. 40 CFR 265.53(b)
1. Unit(s) involved. Contingency Plan
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste _____
 4. Describe area in which violation occurred. PAPERWORK
 5. Specifics of violation. Facility failed to ~~revised~~ revise their Contingency Plan to local emergency contacts: Police Dept, Fire Dept, Hospital.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
During a recent incident at the facility, the fire department's copy of their contingency plan was out-dated and incorrect.
 7. Date violation occurred? JAN 28, 1997
 8. Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

17

- Regulation violated: 40 CFR 262.34 ref. 40 CFR 265.54(c)
1. Unit(s) involved. CONTINGENCY PLAN
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste _____
 4. Describe area in which violation occurred. PAPERWORK
 5. Specifics of violation. FACILITY failed to amend their Contingency Plan as their facility changed in design and construction
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
No amendment to contingency plan in reference to the use of the mobile tanker, used for temporary ~~non-haz~~ non-haz WASTE/leak storage.
 7. Date violation occurred? JAN 28, 1997
 8. Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

18

- Regulation violated: 40 CFR 262.34 ref. 40 CFR 265.54(d)
1. Unit(s) involved. Contingency Plan
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste _____
 4. Describe area in which violation occurred. PAPERWORK
 5. Specifics of violation. FACILITY failed to amend their Contingency Plan as their list of emergency coordinators changed.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
Both emergency coordinators on existing Contingency Plan no longer work at the facility.
 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)

19

- Regulation violated: 40 CFR 262.34(c)(1) ref. 40 CFR 265.171
1. Unit(s) involved. 1-55 gallon container used for Sat. Accumulation, 1-5 gallon container
 2. Type of waste (waste code and constituents) D001
 3. Quantity of waste Less than 55 gallons
 4. Describe area in which violation occurred. The Satellite Accumulation area is located in the Tank Cleaning Area. The five gallon container was located in the Tote Washing Area.
 5. Specifics of violation. Both containers were observed to be open during the inspection.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
Pictures of both containers
 7. Date violation occurred? JAN 28, 1997
 8. Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

20

- Regulation violated: 40 CFR 262.34(c)(1) ref. 40 CFR 262.34(c)(1)(ii)
1. Unit(s) involved. 1-55 gallon container, and 1-5 gallon container
 2. Type of waste (waste code and constituents) D001
 3. Quantity of waste Less than 55 gallons
 4. Describe area in which violation occurred. The one-55 gallon container, used for Sat. Accumulation was located in the Tank Cleaning Area, the one five gallon container was observed in the Tote Washing Area.
 5. Specifics of violation. Both containers were observed to be not labeled as a hazardous waste.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
Pictures of both containers
 7. Date violation occurred? JAN 28, 1997
 8. Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

21

- Regulation violated: 40 CFR 268.7(a)(7)
1. Unit(s) involved. MANIFESTING
 2. Type of waste (waste code and constituents) D001
 3. Quantity of waste _____
 4. Describe area in which violation occurred. PAPERWORK
 5. Specifics of violation. Facility failed to maintain LDR notices for manifest document NO. 08296(8-9-96) and 08396(11-5-96)
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
Manifest copies
 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)

- Regulation violated: _____
1. Unit(s) involved. _____
 2. Type of waste (waste code and constituents) _____
 3. Quantity of waste _____
 4. Describe area in which violation occurred. _____
 5. Specifics of violation. _____
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) _____
 7. Date violation occurred? _____
 8. Has facility been cited for this violation in past? yes__ no__
Date(s) of past violation? _____

- Regulation violated: _____
1. Unit(s) involved. _____
 2. Type of waste (waste code and constituents) _____
 3. Quantity of waste _____
 4. Describe area in which violation occurred. _____
 5. Specifics of violation. _____
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) _____
 7. Date violation occurred? _____
 8. Has facility been cited for this violation in past? yes__ no__
Date(s) of past violation? _____

- Regulation violated: _____
1. Unit(s) involved. _____
 2. Type of waste (waste code and constituents) _____
 3. Quantity of waste _____
 4. Describe area in which violation occurred. _____
 5. Specifics of violation. _____
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) _____
 7. Date violation occurred? _____
 8. Has facility been cited for this violation in past? yes__ no__
Date(s) of past violation? _____

SPECIFIC VIOLATION(S)

Regulation violated: _____

1. Unit(s) involved. _____
2. Type of waste (waste code and constituents) _____
3. Quantity of waste _____
4. Describe area in which violation occurred. _____
5. Specifics of violation. _____
6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) _____
7. Date violation occurred? _____
8. Has facility been cited for this violation in past? yes__ no__
Date(s) of past violation? _____

Regulation violated: _____

1. Unit(s) involved. _____
2. Type of waste (waste code and constituents) _____
3. Quantity of waste _____
4. Describe area in which violation occurred. _____
5. Specifics of violation. _____
6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) _____
7. Date violation occurred? _____
8. Has facility been cited for this violation in past? yes__ no__
Date(s) of past violation? _____

Regulation violated: _____

1. Unit(s) involved. _____
2. Type of waste (waste code and constituents) _____
3. Quantity of waste _____
4. Describe area in which violation occurred. _____
5. Specifics of violation. _____
6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) _____
7. Date violation occurred? _____
8. Has facility been cited for this violation in past? yes__ no__
Date(s) of past violation? _____

1-28-97

DANA TRANSPORT, INC.

Violations

Manifests:

1) NO CDR NOTIFICATIONS FOR MANIFEST #'S - # 08296 - 08/09/96
08396 - 11/5/96
40 CFR 268.7 (a) (7)

2) NO WRITTEN WASTE MINIMIZATION PLAN

3) INSPECTIONS

- NO WEEKLY INSPECTIONS ON CONTAINERS OF H.W.
40 CFR 265.174

4 - NO DOCUMENTATION OF INSPECTIONS
15 A NCAC 13A .00010 (i)

5) CONTINGENCY PLAN 40 CFR 265.50

- AMENDMENT TO CONTINGENCY FOR NEW EMER. COORD.
NOT DONE 40 CFR 265.54 (c) (2)

6) - 40 CFR 265.55 NO EMERG. COORD. APPOINTED

? 7) 40 CFR 265.56 Emergency Procedures

8) 40 CFR 267.34 Emergency Arrangements

TRAINING RECORDS

9) 40 CFR 265.16

Facility's training not in accordance with RCRA Regulations - No 1) Job titles 2) written job descrip. 3) training Director's Qualif. 4) Description of Intro + Cont. training, 5) Documentation of training given

10) General Inspection Requirements

40 CFR 265.15 (b)(1) - No written schedule for inspecting oil monitoring equip, operating and struct. equip (such as dikes and sump pumps - most are important to preventing, detecting or responding to env. or human health hazards

11) SATellite Accumulation Areas

2 - Areas

1 - Tank Cleaning Area - 1,55 gallon container, OPEN, NO M.W. LABEL

1 - Tote Cleaning Area - 1,5 gallon container, Releases of H.W. on side of container, OPEN, NO M.W. LABEL

12) SPILLAGE AREA

2 - AREAS

1 - TANK Cleaning Area - 5 ^{55 gallon} M.W. Containers in storage
NO AISLE SPACE

2 - TOTE Area - 6 - 55 gallon containers in storage

A) NO AISLE SPACE, B) NO ACCUM. START DATE

MEMO

DATE: _____

TO: _____

SUBJECT: _____

Messerschmidt

Cad Springs - Exit - 9:00 AM TENDCO

FINE STATION

65 → ~~Past~~ Glenwood Dr.
Turn Right - couple ^{blocks on} left

ROVAN + Glenwood BACK 1:30

From: _____



North Carolina Department of Environment,
Health, and Natural Resources



Printed on Recycled Paper

- (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.

[Comment: 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:
 - (1) 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.

Amy Larkin -

and Well Water

Robin Purcell - Computer

Give Mr. Mayo

A call in the morning

Michael Tate -

Southern Devices

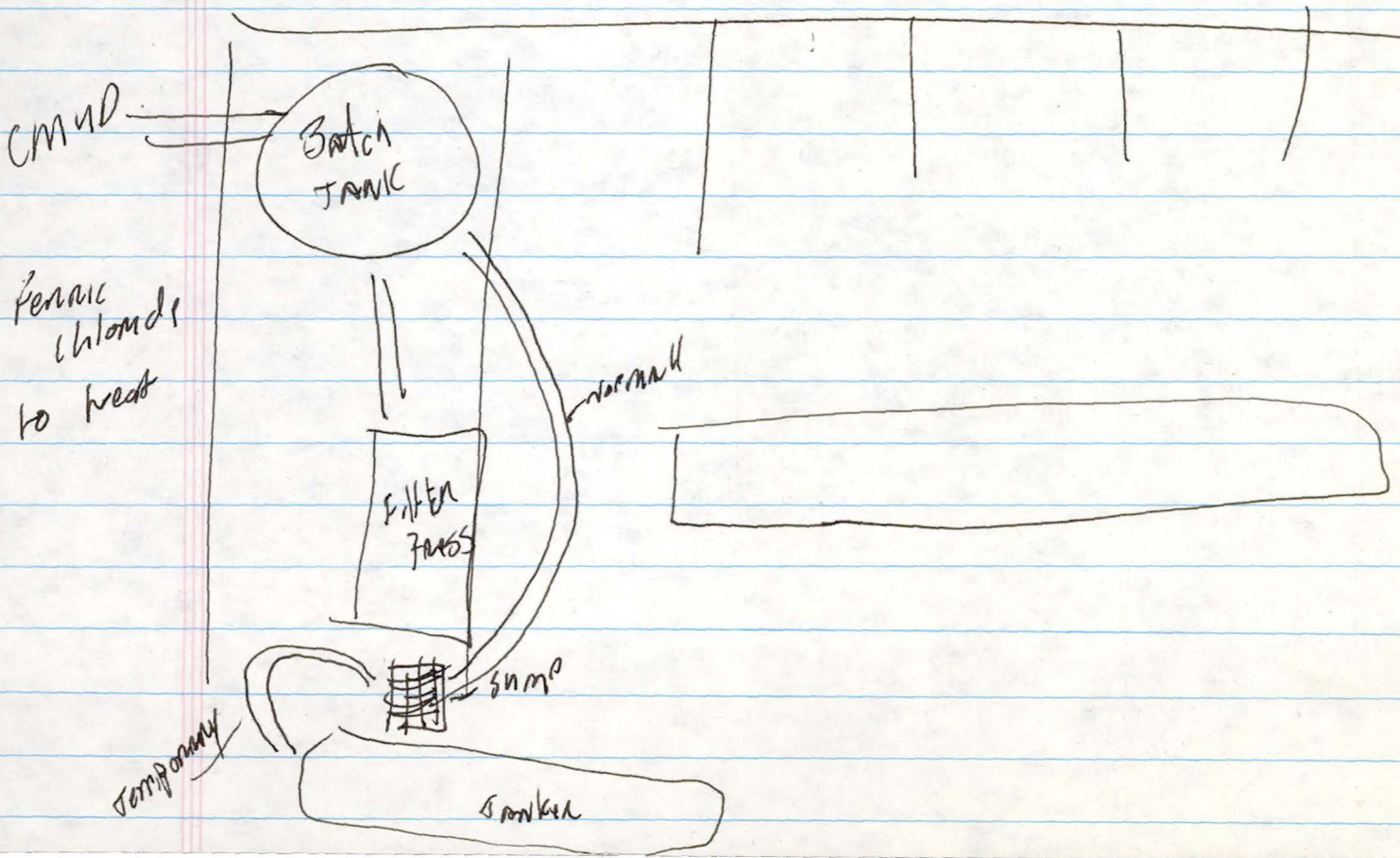
P.O. Driver 68

Morganton N.C. 28655

Employee - 12:34 called Police

5300 Batch Tank
At 5000

Reason - Didn't know how full the
tanker was -



Robin Jones

894-0470

P. Ave Long

Mr. Mills

NC. Vet School

Discharge of Wastewater

UNSTRATED

STEVE JACKLOCKI

1-29-97

NON-SURFACE Dept.

Precautionary Measure - large % water
small amt. of other

ENGINE 21

Location
MT Holly Rd. - Paw Creek

1/8

HAZMAT Responded - Already taken

UNKNOWN MATERIAL -

JADLOCKI - WORKER

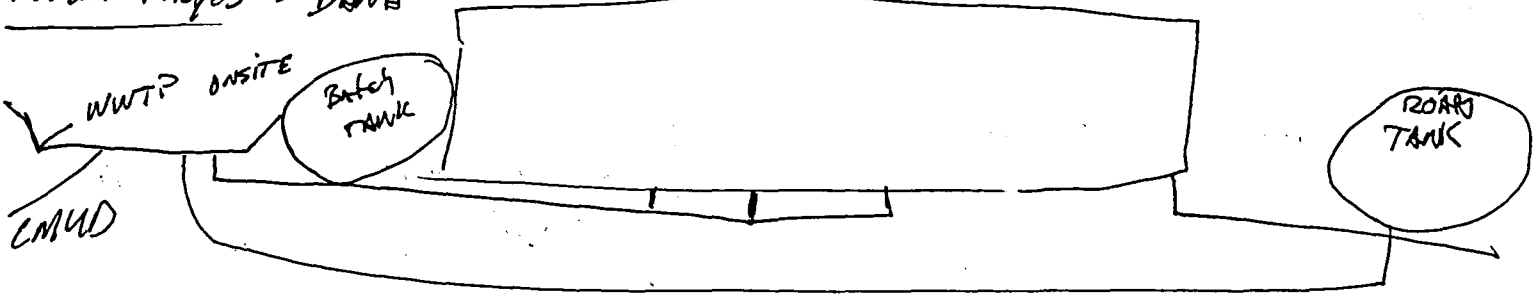
STEVE JACKLOCKY - MCDPR - ordered to clean up soil
NOV -

CANYON TANK TRUCK - WASHING PURPOSES

CMUD PERMIT - STORAGE TANK - RINSE OFF -> TO CMUD

ODORS FROM NEIGHBORS

Robert Hayes - DANA



399-3303

spill on these property

3/4 normally full
20 gallons - make more

3 FT WIDE -> 30 FT

1 1/2 -> 60 FT
6-8 inches

From: "Davidson, Gilbert L." <n1eg434@mro.ehnr.state.nc.us>
Organization: NC DEHNR Mooresville Regional Ofc.
To: JParker@mro.ehnr.state.nc.us
Date sent: Tue, 14 Jan 1997 10:04:37 +0500 ET
Subject: Metal disposal-Meck
Priority: normal

MM

M.W. WBS/1005

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

L

Soil Cherokee Monday Afternoon

Anonymous call - Employee would be fired

Engine! - A SP14 - could not make contact with R.P.

JANUARY - Temporary Molding

Used Motor Oil - 170 ft - to stream - could see stains consistently

When stop - could not read it Acids, Caustics, Gasolines, Diesel

Responsible party - shown - had occurred Monday Afternoon

20 gallons not correct

Could Permit - NO -
6 inch PVC STUB -

~~THAT~~ - GAY McCORMACK 542-7140
Fire Dept. Hill (636)
Burt Massey -
Station 13 - 399-4710
B.H.H.

MEMO

DATE: _____

TO: _____

SUBJECT: _____

Expand Phone

TIM DOWNS

GARY Mc CORMACK

Robert James

DANA

STRAIGHT

From: _____



North Carolina Department of Environment,
Health, and Natural Resources



Printed on Recycled Paper

MEMO

DATE: _____

TO: _____

SUBJECT: _____

CMUD - CROTTY MARLASE

Tom Downs - CMUD - ~~STP~~

391-5161

system on about a year/1/2

now - year ago - monthly sampling

sampling data - years worth

dil water separator

dil grease solids

Pre treatment system ↴

physical / chemical precipitation

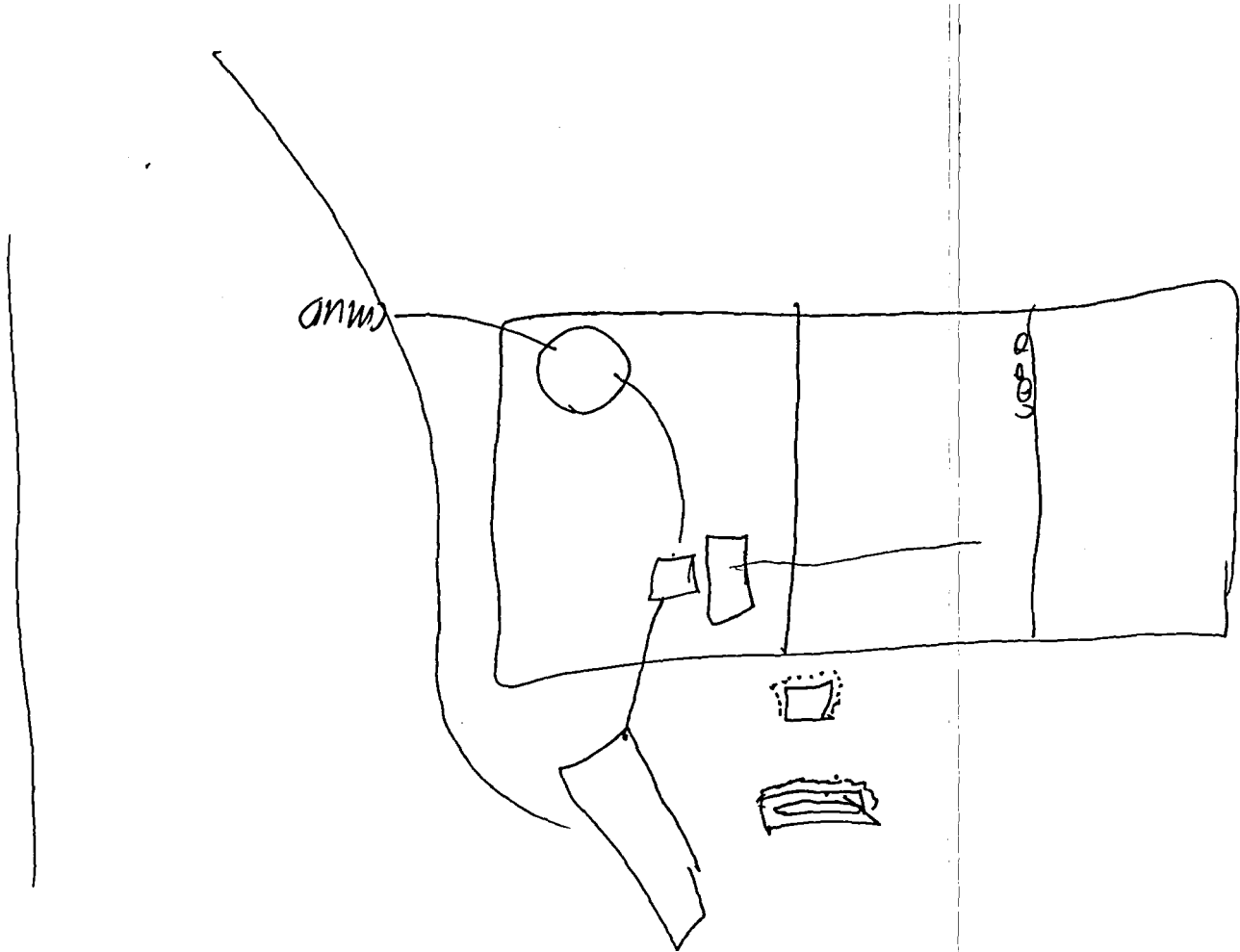
From: _____



North Carolina Department of Environment,
Health, and Natural Resources



Printed on Recycled Paper



Extinguisher + EYE WASHES

- ① 1) ~~40 CFR 262.11 HAZ Waste Determination~~
- ② 2) ~~40 CFR 262.34 (a)(4) 40 CFR 265.35 Aisle Space~~
- ③ 3) ~~40 CFR 267.34 (a)(4) 40 CFR 265.31 Releases~~
- ④ 4) ~~40 CFR 267.34 (a)(1)(i) 40 CFR 265.174 Inspection~~
- ⑤ 5) ~~40 CFR 267.34 (a)(4) 40 CFR 265.54 Contingency Plan~~
- ⑥ 6) ~~40 CFR 262.34 (a)(4) 40 CFR 265.53 (b) Copies of Cont. Plan~~
- ⑦ 7) ~~40 CFR 262.34 (a)(4) 40 CFR 265.16~~
 - A - (1) (2) (3)
 - B - annual review
 - D - (1) (2) (3) (4)
 - E - first training records
- ⑧ 8) ~~40 CFR 268.7 (a)(2) LDR~~
- ⑨ 9) ~~40 CFR 262.34 (a)(2) Accumulation Sv. Dates~~
- ⑩ 10) ~~40 CFR 262.34 (c)(1)(i)(ii) (ii) OPEN containers~~
 - (i) Labeled containers
- 11)

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
CHARLOTTE, NC 28214

July 30, 1996

RE EPA ID NO.: NCD074505850

Dear Sir/Madam:

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.

Sincerely,

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

Current Computer Record

'X' indicates operation status of your facility.

<input checked="" type="checkbox"/> LARGE GENERATOR	<input type="checkbox"/> STORES	<input type="checkbox"/> TRANSPORTER
<input type="checkbox"/> SMALL QNTY GENERATOR	<input type="checkbox"/> TREATER	<input type="checkbox"/> SMALL QTY BURNER
<input type="checkbox"/> EXEMPT SMALL QNTY	<input type="checkbox"/> DISPOSER	<input type="checkbox"/> USED OIL
<input type="checkbox"/> LG QNTY. UNIVERSAL		

Company name:	DANA TRANSPORT INC
Owner:	RONALD B DANA
Contact:	HAYES ROBERT, CONTAINER
Phone number:	704/399-3395
Location address:	7254 MT HOLLY RD
City, St & ZIP:	CHARLOTTE, NC 28214-

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

Your EPA ID number is currently active.

cc: ROBIN HEDDEN

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

United States Environmental Protection Agency

Date Received
(For Official Use Only)

JUL 22 1996

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. First Notification B. Subsequent Notification (Complete Item C)

C. Installation's EPA ID Number

NC D 074505850

II. Name of Installation (Include company and specific site name)

DANA TRANSPORT INC

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street
NO CHANGE

Street (Continued)

City or Town

State

Zip Code

County Code

County Name

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME AS LOCATION

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

HAYES

ROBERT

Job Title

Phone Number (Area Code and Number)

Container Mgr

704-399-3395

VI. Installation Contact Address (See Instructions)

A. Contract Address Location Mailing Other

B. Street or P.O. Box

7254 MOUNT HOLLY RD

City or Town

State

Zip Code

CHARLOTTE

NC 28214-

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

RONALD B. DANA

Street, P.O. Box, or Route Number

P.O. BOX 962

City or Town

State

Zip Code

WOODBRIIDGE

NJ 07095-

Phone Number (Area Code and Number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed) Month Day Year

908-750-9100

P

P

Yes No

12/1/92

SIC CODES

ID - For Official Use Only											

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to instructions)

A. Hazardous Waste Activity		B. Used Oil Recycling Activities
<p>1. Generator (See Instructions)</p> <p><input checked="" type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input type="checkbox"/> b. 100 to 1000 kg/mo (200-2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input checked="" type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify</p>	<p><input checked="" type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Boiler and/or Industrial Furnace</p> <p><input type="checkbox"/> 1. Smelter Deferral</p> <p><input type="checkbox"/> 2. Small Quantity Exemption</p> <p>Indicate Type of Combustion Device(s)</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Used Oil Fuel Marketer</p> <p><input type="checkbox"/> a. Marketer Directs Shipment of Used Oil to Off-Specification Burner</p> <p><input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications</p> <p>2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)</p> <p><input type="checkbox"/> a. Utility Boiler</p> <p><input type="checkbox"/> b. Industrial Boiler</p> <p><input type="checkbox"/> c. Industrial Furnace</p> <p>3. Used Oil Transporter - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Transporter</p> <p><input type="checkbox"/> b. Transfer Facility</p> <p>4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Process</p> <p><input type="checkbox"/> b. Re-refine</p>

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an LD number; See instructions.)

1	2	3	4	5	6

X. 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.

Signature	Name and Official Title (Type or print)	Date Signed
<i>Robert F Hayes</i>	Robert F Hayes Dana Container Manager	07/18/96

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



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

2500-FM-LRWM0051 REV. 11/95

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D 0 7 4 5 0 5 8 5 0 5 1 5 5 2		Manifest Document No.	2. Page 1 of 1	Information within the blue border is not required by Federal law but may be required by State law.	
3. Generator's Name and Mailing Address Dana Container, Inc. 7254 Mount Holly Road, Charlotte, NC 28214				A. State Manifest Document Number PAE 6151552			
4. Generator's Phone (800) 796-3262				B. State Gen. ID Same			
5. Transporter 1 Company Name Maumee Express, Inc.		6. US EPA ID Number N J D 9 8 6 6 0 7 3 8 0		C. State Trans. ID PA-AH 0420		D. Transporter's Phone (908) 424-8441	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Trans. ID PA-AH		F. Transporter's Phone ()	
9. Designated Facility Name and Site Address Remtech Environmental Lewisberry, Inc. 550 Industrial Drive Lewisberry, PA 17339				10. US EPA ID Number P A D 0 6 7 0 m 9 8 8 2 2		G. State Facility's ID	
				H. Facility's Phone (717) 938-4700			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. RQ, Hazardous Waste Liquid, n.o.s., 9, NA3082,PGIII (Trichloroethylene, Tetrachloroethylene) (FO02, D040, D039, D033, D032, D030) (ERG#171)				x x 4 D M		x x 2 2 0	G F O O 2
b. RQ, Waste Flammable Liquids, n.o.s., 3, UN1993, PGII (Ethanol, Varnish) (D001) (ERG#128)				x 1 1 D M		x x 5 0 5	G D O O 1
c.							
d.							
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
Lab Pack		Physical State		Lab Pack		Physical State	
a. []		L I T, E		c. []		[]	
b. []		L I DCS010-B-FMI		d. []		[]	
15. Special Handling Instructions and Additional Information a) (Carbowax, Latex 70-75%, Starch, carbon sediment 20-25%, Trichloroethylene 0-.1%, Tetrachloroethylene 0-.1%, Methylene Chloride 0-.1%, 2,4-DINITRODINITROTOLUENE 0-.1%, Hexachlorobenzene 0-.1%, Hexachloro-1,3-Butadiene 0-.1%, Speedi-dry 0-10%) Also: D033, D032, D030 b) (Ink 50-70%, Varnish 20-40%, Ethanol 5-40%) <u>Emergency Contact 1-800-243-3452</u> Plate#							
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. 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.							
Printed/Typed Name James E. Adams				Signature James E. Adams		MONTH DAY YEAR 12 10 97	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Allen W Frank				Signature Allen W Frank		MONTH DAY YEAR 1 2 1 0 9 7	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		MONTH DAY YEAR	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name				Signature		MONTH DAY YEAR	



PAE 6151552

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.
 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

- Item 1.** Generator/Shipper's US EPA ID No. - Enter the twelve digit US EPA Identification Number. Manifest Document No. - Assign a five digit number unique to all others assigned by this Generator/Shipper.
- Item 2.** Page 1 of ___ - Enter the total number of pages used to complete this Manifest counting this Manifest and Continuation Sheets, if any.
- Item 3.** Generator/Shipper's Name and Mailing Address - Enter the complete name of the generator/shipper and the complete mailing address. The address should be the location that will manage the returned Manifest forms.
- Item A.** 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 B.** State Gen ID - Not required for PA Generators.
- Item 4.** Generator's Phone Number - Enter the area code and telephone number where an authorized agent of the Generator may be contacted.
- Item 5.** Transporter 1 Company Name - Enter the complete company name of the first Transporter who will transport the waste.
- Item 6.** Use EPA ID Number - Enter the twelve digit US EPA Identification Number of the Transporter identified in Item 5.
- Item C.** State Trans. ID - Enter the four digits of the License No. issued by PA DEP.
- Item D.** Transporter's Phone - Enter the area code and the telephone number where an authorized agent of the Transporter may be contacted.
- Item 7.** Transporter 2 Company - If applicable, see item 5.
- Item 8.** US EPA ID Number - If applicable, see Item 6.
- Item E.** State Trans. ID - If applicable, see Item C.
- Item F.** Transporter's Phone - If applicable, see Item D.
- Item 9.** Designated Facility Name and Site Address - Enter the complete company name and complete site address of the facility designated to receive the waste listed on this Manifest. 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.
- Item 11.** 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 hazardous materials by DOT, enter a description of the waste. List DOT Hazardous Materials first.
- Item 12.** Containers (No. and Type) - Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.
- Item 13.** Total Quantity - Enter the total quantity of each waste. **Do not use decimals or fractions.**
- Item 14.** Unit (Wt/Vol) - Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table I - Types of Containers

DM = Metal drums, barrels, kegs	DT = Dump truck
DW = Wooden drums, barrels, kegs	CY = Cylinders
DF = Fiberboard or plastic drums, barrels, kegs	CM = Metal boxes, cartons, cases (roll-offs, hoppers, gondolas, etc.)
TP = Tanks portable	CW = Wooden boxes, cartons, cases, pallets
TT = Cargo tanks (tank trucks)	CF = Fiber or plastic boxes, cartons, cases, pallets
TC = Tank cars	BA = Burlap, cloth, paper or plastic bags

Table II - Units of Measure

G = Gallons (liquid only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic Meters

- Item I.** 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 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."
- 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 (S-solid, L-liquid, SL-sludge or G-gas).
- Item K.** Handling Codes for Wastes Listed Above - Not required for PA Generators.
- Item 15.** Special Handling Instructions and Additional Information - Use this space to indicate special transportation, treatment, storage, or disposal 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.
- Item 16.** Generator/Shipper's Certification - Read and sign by hand the certification statement. Enter the date (MM/DD/YY) the waste was shipped. If a 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.
- Item 20.** 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 (MM/DD/YY).

4



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



2 7 6 2 3 1 3

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-97

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NCID074505850	Manifest Document No. 62255	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address DANA CONTAINER, INC. 7254 MOUNT HOLLY ROAD - CHARLOTTE, N.C. 28214				A. State Manifest Document Number NJA 2762313		
4. Generator's Phone (704) 399-3395		6. US EPA ID Number NJ0000022193		C. State Trans. ID-NJDEP SAME \$1,937.6		
5. Transporter 1 Company Name Allstate Power Vac		8. US EPA ID Number		D. Transporter's Phone (908) 815-0220		
7. Transporter 2 Company Name		10. US EPA ID Number		E. State Trans. ID-NJDEP		
9. Designated Facility Name and Site Address CYCLE CHEM, INC. 217 SOUTH FIRST STREET ELIZABETH, NEW JERSEY 07206				F. Transporter's Phone (908) 915-0220		
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group)				G. State Facility's ID		
				H. Facility's Phone (908) 355-5800		
HM		12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a.	X	RQ Hazardous Waste Liquid N.O.S. 9 NA3082 PGIII D030 D032 D033 D039 D040 F002		7	DM	G D030 D032 D033 D040 F002 D039
b.	X	RQ Waste Flammable Liquids N.O.S. 3 UN1993 PGII D001 F003		3	DM	G D001 F003
c.	X	RQ Waste Flammable Liquids N.O.S. 3 UN1993 PGII D001 D008		4	DM	G D001 D008
d.						
J. Additional Descriptions for Materials Listed Above L I E Motor Oil 95-98% Starch Carbon sediment 20-25% Naphtha 2-5% Lead 1000ppm Chloride 1% 2,4-Dinitrotoluene 1% Tetrachloroethylene 1% Hexachloro- L I Ink 30-60% Ethylene Glycol 5-10% Oil 5-10% Ethyl Benzene 15-25%				K. Handling Codes for Wastes Listed Above a. S O / c. S O / b. S O / d.		
15. Special Handling Instructions and Additional Information Emergency phone #908-354-0210 Clean Venture, Inc. (a) benzene 1% Hexachloro-1,3-Butadiene 1%						
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. 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.						
Printed/Typed Name James E. Adams		Signature James E. Adams		Month Day Year 09 11 97		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Carl Vena		Signature Carl Vena		Month Day Year 09 11 97		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space 13A) XX385 13B) XX165 13C) XX220 F) NOT NECESSARY						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name PAPA		Signature Nick Pope		Month Day Year 09 12 97		



In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172

GENERATOR

TRANSPORTER

FACILITY

NJA 2762313

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 the law, and could make you subject to civil or criminal liabilities as specified in the New Jersey Hazardous Waste Regulations.

INSTRUCTIONS—IMPORTANT:

READ ALL INSTRUCTIONS BEFORE COMPLETING

State & Federal regulations require Generators, Transporters, and Treatment, Storage & Disposal Facilities (TSDFs) to use this form and if necessary the continuation sheet for both inter- and intrastate shipments. Continuation sheets may be purchased commercially and photocopied to provide copies as described below.

The New Jersey manifest contains 8 copies. **ALL COPIES MUST BE LEGIBLE.** This form is designed for use on a 12 pitch (elite) typewriter; a firm ball point pen may also be used only if you press down HARD. The 8 copies must be filed with the appropriate party as they are completed. COPY DISTRIBUTION is as follows:

- ORIGINAL: DESTINATION STATE—TSDF must mail original to the state regulatory agency where the facility is located.
- COPY 2: GENERATOR STATE—The TSDF mails this copy back to the state regulatory agency where the waste was generated.
- COPY 3: GENERATOR COPY—The TSDF mails this copy back to the generator of the waste.
- COPY 4: TSDF COPY—TSDF keeps this copy for his records.
- COPY 5: 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.
- COPY 6: DESTINATION STATE—The generator mails this copy to the state regulatory agency where the designated facility (TSDF) is located.
- COPY 7: GENERATOR STATE—The generator mails this copy to the state regulatory agency where the waste was generated.
- COPY 8: GENERATOR COPY—The generator keeps this copy for his records.

ALL 8 COPIES MUST BE LEGIBLE

MANIFEST FORM ACQUISITION

1. If the destination (consignment) state supplies a manifest & requires its use, then the generator is obligated to obtain the manifest from that state.
2. If the destination state does not supply the manifest, but the generator state does, then the generator is obligated to obtain the manifest from the generator state.
3. If neither the generator state or the consignment state supplies the manifest, then the generator may obtain the manifest from any source.

GENERATOR SECTION

- Item 1: 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. Use of serially increasing numbers (e.g. 00001, 00002, etc.) is recommended.
- Item 2: PAGE 1 OF — Enter the total number of pages used to complete this manifest, i.e. the first page plus the number of continuation sheets, if any.
- Item 3: 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.
- Item 4: GENERATOR'S PHONE NUMBER—Enter a telephone number with area code where an authorized agent of the generator can be reached in an emergency.
- Item 5: TRANSPORTER 1 COMPANY NAME—Enter the company name (as notified to EPA) of the first transporter who will transport the waste.
- Item 6: US EPA ID NUMBER—Enter the EPA identification number of the first transporter identified in item 5.
- Item 7: 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.
- Item 8: US EPA ID NUMBER—If a second transporter is used, enter the EPA identification number of the second transporter identified in item 7.
- Item 9: DESIGNATED FACILITY NAME & SITE ADDRESS—Enter the company name and site address (as notified to the EPA) of the treatment, storage, or disposal facility (TSDF) designated to receive the waste listed on this manifest. The address must be the site address, which may differ from the mailing address.
- Item 10: EPA ID NUMBER—Enter the EPA identification number of the designated TSDF (or waste reuse facility) listed in item 9.
- Item 11: USDOT DESCRIPTION—Enter the correct USDOT shipping name, hazard class or division, the identification number and the packing group (49 CFR 172.202). The word waste must appear as part of the USDOT shipping name if the waste is a federal RCRA hazardous waste (49 CFR 172.101). For a waste with a n.o.s. designation enter the information as required by 49 CFR 172.203. Enter additional shipping description information as required by 49 CFR 172 Subpart C. If more than 4 wastes are being shipped, a second manifest or continuation sheets should be used. For information on USDOT waste descriptions call your USDOT regional office.
- Item 12: CONTAINERS (NO. & TYPE)—Enter the number of containers for each waste and the appropriate abbreviations from Table 1 (below) for the type of container used.

**TABLE 1
CONTAINER TYPES**

- DM—Metal drums, barrels, kegs
- DW—Wooden drums, barrels, kegs
- DF—Fiberboard or plastic drums, barrels, kegs
- TP—Tanks portable
- TT—Cargo tanks (Tank trucks)
- TC—Tank cars
- DT—Dump truck
- CY—Cylinders
- CM—Metal boxes, cartons, cases (including roll-offs)
- CW—Wooden boxes, cartons, cases
- CF—Fiber or plastic boxes, cartons, cases
- BA—Burlap, cloth, paper/plastic bags

Item 13: TOTAL QUANTITY—Enter the total quantity of waste described on each line.

Item 14: UNIT (WL/Vol.)—Enter the appropriate abbreviation from Table II (below) for the unit of measure used in determining the total quantity of waste described on each line.
DO NOT USE FRACTIONS

TABLE II UNITS OF MEASURE

- G—Gallons (liquids only)
- P—Pounds
- T—Tons (2000 lbs.)
- Y—Cubic yards
- L—Liters (liquids only)
- K—Kilograms
- M—Metric Tons (1000 kg)
- N—Cubic Meters

- Item 15: SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION—Use this space to indicate special transportation, treatment, storage, disposal, or Bill of Lading information, if any. If an alternate facility is designated, note it here. For INTERNATIONAL SHIPMENTS, generators must enter the point of departure (city & 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.
- Item 16: GENERATOR'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.
- Item A: 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.
- Item B: 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".
- Item C: STATE TRAN #1 ID—Enter the New Jersey state permit number. This must include both the transporter's permit number and the decimal number of the hazardous waste transport unit of hazardous waste vehicle which contains the waste. For rail shipment(s) enter the alpha numeric I.D. number assigned to the railcar in lieu of the decimal number.
- Item D: TRANSPORTER PHONE—Enter a telephone number with area code where an authorized agent of the transporter can be reached.
- Item E: STATE TRAN #2 ID—If applicable, enter the New Jersey State permit number of the waste carrying portion of the second vehicle.
- Item F: TRANSPORTER PHONE—If applicable, enter a telephone number with area code where an authorized agent of the second transporter may be reached.
- Item G: STATE FACILITY'S ID—No entry is required by New Jersey.
- Item H: FACILITY PHONE—Enter a telephone number with area code of the TSDF designated to receive the waste listed on the manifest.
- Item I: WASTE NO.—Enter the 4-digit hazardous waste number as it appears in N.J.A.C. 7:26G-5.1 et seq. (For example "K047" is the waste number designated for pink/red water from TNT operations.) The proper waste number that accurately describes the shipment, shall be determined according to the hierarchy at N.J.A.C. 7:26G-6.2.
- Item J: ADDITIONAL DESCRIPTIONS FOR MATERIALS LISTED ABOVE—Enter description of analysis for any waste which does not have a complete USDOT shipping description or has an n.o.s. designation. Enter a general description of the waste stream (i.e. groundwater contaminated with creosote and copper sulfate). Additionally, for any n.o.s. 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, L = Liquid, G = Gas, SL = Sludge) EPA hazard codes (I = Ignitable, C = Corrosive, R = Reactive, E = TCLP, H = Acute Hazardous, T = Toxic). Enter additional information as required by the waste code hierarchy at N.J.A.C. 7:26G-8.2.

TRANSPORTER SECTION

It is a violation by the transporter if he accepts hazardous waste from a generator who fails to properly complete the manifest, transports waste to an unauthorized facility, and/or fails to obtain the date and handwritten signature of the next hauler or owner/operator of the TSD facility on the manifest.

- Item 17: 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.
- Item 18: TRANSPORTER 2 ACKNOWLEDGEMENT—If applicable, follow instructions for item 17 for the second transporter.
- NOTE: ALL HAZARDOUS WASTE TRANSPORTERS OPERATING IN NEW JERSEY MUST HAVE A VALID NEW JERSEY HAZARDOUS WASTE TRANSPORTER'S PERMIT.

DESIGNATED FACILITY (TSDF) SECTION

- ITEM 19: DISCREPANCY INDICATION SPACE—The authorized representative of the designated facility must note in this space any significant discrepancy between the waste 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 rejected 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.
- Item 20: FACILITY OWNER/OPERATOR CERTIFICATION—Print or type the name of the person receiving the waste on behalf 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.
- Item K: HANDLING CODES—TSDF SHOULD COMPLETE—Enter the ultimate handling method utilized at the designated facility for each waste. Only the following process codes may be used: Storage=S01 (container); S02 (Tank); S04 (Surface Impoundment); S05 (Other-specify); Treatment=T01 (Tank); T02 (Surface Impoundment); T03 (Incinerator); T04 (Other-specify); Disposal=D79 (Injection Well); D80 (Landfill); D81 (Land Application); D82 (Ocean Disposal); D83 (Surface Impoundment); D84 (Other-specify).
- *NOTE: 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 item "G".

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 estimates including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

9116197

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

RE: Manifest Number: NJA 2579444

Dear Sir:

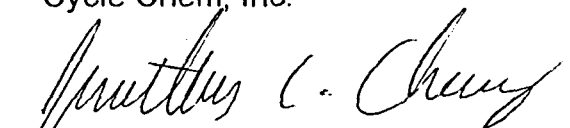
Enclosed is a copy of the above referenced manifest. There is a discrepancy as defined in 40 CFR 264.72 (a) (1) on this manifest due to the material not matching the waste profile after analysis at Cycle Chem, Inc.'s NJDEP certified laboratory. The discrepancy has been corrected in Section 19 of the 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

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,
pagejs@wastenot.ehnr.state.nc.us, n1nh722@wsro.ehnr.state.n
Subject: 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.



M

Charlotte Fire Department



Fax Transmission

Sendee JOE PARKER

Fax # 663-6040

of Pages 2

Sender BART MASSEY

Fax # 704/336-4204

Remarks PER OUR CONVERSATION

MECKLENBURG COUNTY DEPARTMENT OF ENVIRONMENTAL PROTECTION
EMERGENCY ALERT/RESPONSE FORM

DATE REPORTED: 06/10/97 TIME REPORTED: 2:12 PM SECTION: WQ LOG NO: 97-01231
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
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:
(1) ARCOPLUS AIRCRAFT DEICING FLUID QTY/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: 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 AQ: 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)
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
STATUS: CLOSED DATE: 06/24/97 E/A PENDING DATE: / /
OTHER: DATE: / /
INVESTIGATIVE COSTS: MANHOURS #: 3 \$60.00 LAB COSTS: _____
MILEAGE COSTS COUNTY: PRIVATE: OTHER: _____
TOTAL COST OF EMERGENCY INVESTIGATION: \$60.00
OTHER AGENCIES INVOLVED: _____
NARRATIVE 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.

NOTIFICATION OF FINAL DISPOSITION TO REPORTING PERSON

Anne Loftin 7/1/97 WRITTEN: VERBAL: -
ENVIRONMENTALIST'S SIGNATURE DATE
REVIEWED BY: David J. Limer 7-2-97 RECALL DATE: / /
SECTION HEAD'S SIGNATURE



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

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
Raleigh, North Carolina 27605

cc: Doug H
Keith
Joe ✓
Linda
Helen

Re: Dana Transport, Inc.
NCD 074505850



Dear Mr. Buis:

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.

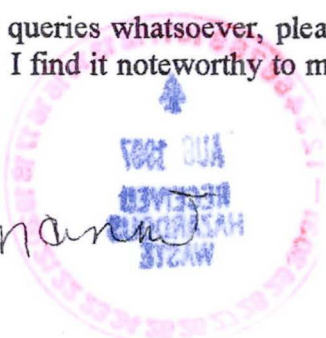
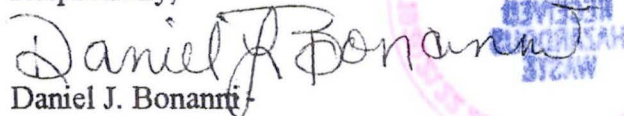
In closing this memorandum, the objective of enforcement is to gain compliance and to promote guidance and education. This objective has been achieved as exhibited in procurement of equipment, training provided and the presence of an environmental ethos that promotes and ensures guidance and education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

NUMBER OF PAGES (INCLUDING COVER) 9

MEMO: This will be our training notebook.
Each employee will have a signed
copy in their training file. If this
doesn't meet DEHNR requirements
please let 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 areas on the date(s) indicated, and that I understand all information presented:

AREA COVERED BY TRAINING	DATE
1. 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	_____
5. Dating containers	_____
6. 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 SIGNATURE _____ DATE _____

TRAINER SIGNATURE _____ DATE _____

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:

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

0 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
HANDBOOKS/TEST, AND FORMAL INSTRUCTION.

ATTACHED IS A LIST OF TRAINED PERSONNEL.

LIST OF VIDEOS SHOWN FOR TRAINING

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

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



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

FAX COVER SHEET

DATE: 06/26/98

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 receipts where I sent
copies of Dana's Contingency Plan
to each agency.

Bob Hayes

P 538 685 876

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to <i>Immigration Dept</i> <i>Carolina Medical Center</i>	
Street & Number <i>1000 Blythe Blvd</i>	
Post Office, State, & ZIP Code <i>Charlotte, NC 28203</i>	
Postage	\$ <i>262</i>
Certified Fee	<i>135</i>
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	<i>110</i>
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	<i>507</i>
Postmark or Date	<i>JUN 26 1997</i>

PS Form 3800, April 1995

P 538 685 877

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to <i>Charlotte Meck Police Dept</i>	
Street & Number <i>601 E Trade St</i>	
Post Office, State, & ZIP Code <i>Charlotte, NC 28202</i>	
Postage	\$ <i>262</i>
Certified Fee	<i>135</i>
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	<i>110</i>
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	<i>507</i>
Postmark or Date	<i>JUN 26 1997</i>

PS Form 3800, April 1995

P 538 685 878

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to <i>Charlotte Meck Fire Dept</i>	
Street & Number <i>600 E Fourth St</i>	
Post Office, State, & ZIP Code <i>Charlotte, NC 28202</i>	
Postage	\$ <i>262</i>
Certified Fee	<i>135</i>
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	<i>110</i>
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	<i>507</i>
Postmark or Date	<i>JUN 26 1997</i>

PS Form 3800, April 1995

P 538 685 879

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to <i>Meck County Environment</i>	
Street & Number <i>710 N Tryon St</i>	
Post Office, State, & ZIP Code <i>Charlotte, NC 28202</i>	
Postage	\$ <i>262</i>
Certified Fee	<i>135</i>
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	<i>110</i>
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	<i>507</i>
Postmark or Date	<i>JUN 26 1997</i>

PS Form 3800, April 1995

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



TWENTY-FIFTH ANNIVERSARY
A QUARTER CENTURY
OF ACHIEVEMENT

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) 2

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

requirements 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 to dial 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 Dana 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.

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 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.

I also wish to receive the following services (for an extra fee):
 1. Addressee's Address
 2. Restricted Delivery
 Consult postmaster for fee.

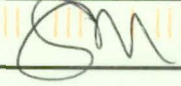
3. Article Addressed to:
 MR ROBERT HAYES
 DANA TRANSPORT INC
 7254 MT HOLLY ROAD
 CHARLOTTE NC 28214

4a. Article Number
 Z 335 772 682 (06/23/97)

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 10-24-97

5. Received By: (Print Name)
 Robert Hayes

6. Signature: (Addressee or Agent)
 X Robert Hayes 

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994 Domestic Return Receipt

Thank you for using Return Receipt Service.

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 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.

I also wish to receive the following services (for an extra fee):
 1. Addressee's Address
 2. Restricted Delivery
 Consult postmaster for fee.


3. Article Addressed to:
 MR ROBERT HAYES
 DANA TRANSPORT INC
 7254 MOUNT HOLLY ROAD
 CHARLOTTE NC 28214

4a. Article Number
 Z 335 772 790 (07/09/97)

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 7-10-97

5. Received By: (Print Name)
 Robert Hayes

6. Signature: (Addressee or Agent)
 X Robert Hayes 

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994 Domestic Return Receipt

Thank you for using Return Receipt Service.

Z 335 772 682
 US Postal Service (06/23/97)
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	Mr. Robert Hayes
Street & Number	Dana Transport, Inc.
Post Office, State, & ZIP Code	7254 Mt. Holly Road
Postage	Charlotte, NC 28214
Certified Fee (JSP)	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

Z 335 772 790
 US Postal Service (07/09/97)
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	Mr. Robert Hayes
Street & Number	Dana Transport, Inc.
Post Office, State, & ZIP Code	7254 Mt. Holly Road
Postage	Charlotte, NC 28214
Certified Fee (JSP)	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

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: Seq#

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

2. 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)(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

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: June 23, 1997
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
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: 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
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: 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

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)

General Information:

Facility Name DANA TRANSPORT, INC.
Location 7254 MT. HOLLY ROAD, CHARLOTTE, N.C. 28214
Mailing Address _____
EPA ID.# NCD 074 505 850 Phone # 704-399-3395
Contact Title ROBERT HAYES
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 TAUHER WASHING FACILITY
Waste Generated POOL, DOOR, FOODS

* Condition A - Waste Determination on unknown container - Completed, sent off as Hz. waste

Manifests:

Approved Transporters? _____ Approved TSD's? _____
Signed Copies? _____ Filled Out Correctly? _____

* LDR Notification Attached? THE FACILITY HAS OBTAINED LDR NOTICES FOR
MANIFEST #'S 08296(8-9-96) AND 08396(11-5-96). IN COMPLIANCE WITH
CONDITION F

Waste Minimization? _____ How? _____

* Hazardous Waste Inspection Records: CONDITIONS B2 + B3

Inspections On Storage Area GOOD INSPECTIONS. IN COMPLIANCE WITH CONDITION B-2+3

Inspections On H.W. Tanks N/A

Inspection On Ancillary Equipment N/A

* 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 CONT. PLAN WAS SENT TO FIRE DEPT., POLICE DEPT.,
+ HOSPITAL.

* Training Records: CONDITION E1, E2, AND E3

Certified Training Documents Available? YES, NEED TO ORGANIZE BETTER.

Any New Employees Since Last Review? NO

Evidence Of Improper/ Inadequate Training? ALL EMPLOYEES HAVE BEEN TRAINED.

Contingency Plan Content - Facility needs to document what agreements they have with responding emergency services, i.e. Fire Dept., Police, Hospital. What roles will they fill in the event of an emergency.

TRAINING RECORDS - The facility has the appropriate type of training and documentation onsite. I recommend that they organize their training documentation into one manual, specific for Hz. waste.

Facility Name DANA TRANSPORT, INC. EPA ID.# NCD 074 505 850
Inspection Date JUNE 23, 1997

Employee Interview: n/a
Names(s) _____ Trained _____

Annual Report Submitted? n/a Copy At Facility? _____

Emergency Preparedness:

Facility Maintained And Operated To Prevent Releases? YES
Internal Communications Or Alarm Present? _____
Device In Area Of Operation To Summon Outside Help? YES
Portable Fire Extinguishers And/ Or Fire Control Equipment? YES
Spill Control Equipment? YES
Adequate Water Volume, Foam, Equipment, Or Auto Sprinkler? _____
All Equipment/ Alarms Tested And Maintained? YES
All Personnel Handling H.W. Have Access To Alarm/ Device? YES
Aisle Space In Area Of Facility Operations? YES

Satellite Accumulation Area(s) 2. Location(s) Both satellite areas have 1-55 gallon containers used for accumulation purposes - both containers are properly labeled as a hazardous waste and closed.

Containers: Closed? Labeled? <55 gal. Stored <3 days if full? _____

Storage Area(s): 1 Description During the reinspection, 17-55 gallon containers were observed to be in storage. All containers were properly labeled as a haz. waste, dated with an accumulation start dated, and closed

Containers: Closed? Aisle space? Labeled? Releases? None

Dated? <90 days? Good condition?

Other H.W. Units: (Applicable Regulations)

Description of Unit _____

External Facility Condition The facility has improved since their last inspection, in handling their hazardous waste onsite.

Facility Name DANA TRANSPORT, INC.

EPA ID.# NCD 074 505 850

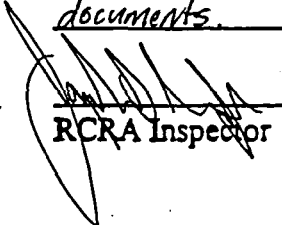
Inspection Date JUNE 23, 1997

Site Deficiencies:

- 1.) 40 CFR _____
- 2.) 40 CFR _____
- 3.) 40 CFR _____
- 4.) 40 CFR _____
- 5.) 40 CFR _____
- 6.) 40 CFR _____

Recommendations/ ~~Notes~~ Continued:

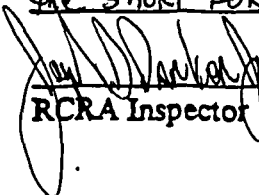
- ① Amend the facility's Contingency Plan to reflect the agreements between responding emergency agencies. When this is done document that these revisions have been sent to the Fire Dept., Police Dept., and Hospital.
- ② The Facility needs to organize their training documents into one specific document for hazardous waste management. When these items are completed, send this office copies of these updated documents.

 6-23-97
 RCRA Inspector (date)

(CERTIFIED MAIL)
 Facility Contact (date)

* **Follow Up Inspection: IN Compliance**

Comments The facility has sent copies of the information compiled from the recommendations made above. The facility faxed copies of the certified letter receipts (June 26, 1997) and a copy of Hazardous Waste Mgmt. Training Document (June 27, 1997). The facility has now come into compliance with the short form compliance order with Admin. Penalty # 97-203.

 7-9-97
 RCRA Inspector (date)

(CERTIFIED MAIL)
 Facility Contact (date)

RCRA INSPECTION REPORT

(x= violation, na= not applicable)

General Information:

Facility Name DANA TRANSPORT, INC.
Location 7254 MT. HOLLY ROAD, CHARLOTTE, N.C. 28214
Mailing Address _____
EPA ID.# NCD 074 505 850 Phone # 704-399-3395
Contact/ Title ROBERT HAYES
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, DOOR, F005

Manifests:

Approved Transporters? _____ Approved TSD's? _____
Signed Copies? _____ Filled Out Correctly? _____
* LDR Notification Attached? FACILITY HAS OBTAINED LDRS IN CONDITION F

Waste Minimization? _____ How? _____

* **Hazardous Waste Inspection Records:** Condition B-2,3
Inspections On Storage Area Good Inspections
Inspections On H.W. Tanks N/A
Inspection On Ancillary Equipment N/A

* **Contingency Plan:** Condition E-4
On Site? YES
Any changes to facility/ processes or Emergency Coordinators since last review? NO
Contingency Plan used? _____ (if yes, was it adequate?) _____
Agreements with Emergency Responders? SENT TO DEPT. OF ENVIRONMENT AND FIRE DEPT. - NEED TO BE SENT TO LOCAL HOSPITAL,

- coordinate Agreements between respondents NO documentation of Fire Dept receiving - will need Police Dept. document inter.
* **Training Records:** Condition E
Certified Training Documents Available? YES
Any New Employees Since Last Review? EVERYONE HAS BEEN TRAINED AT THE FACILITY
Evidence Of Improper/ Inadequate Training? _____

Condition A - container sent off hazardous waste

Facility needs to organize their training program for hazardous waste. This training document needs to be specific to hazardous waste.

Facility Name JANA TRANSPORT INC. EPA ID.# NCD 074 505 850
Inspection Date JUNE 23 1997

Employee Interview:

Names(s) _____ Trained _____

Annual Report Submitted? _____ Copy At Facility? _____

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 Sprinkler? _____

All Equipment/ Alarms Tested And Maintained? _____

All Personnel Handling H.W. Have Access To Alarm/ Device? _____

Aisle Space In Area Of Facility Operations? _____

* Satellite Accumulation Area(s) 2 Location(s) Both Areas have 1-55 gallon containers used for Sat. Accumulation - Containers are labeled and dated as a h.w. waste

Containers: Closed? Labeled? <55 gal. Stored <3 days if full? _____

* Storage Area(s): 1 Description 17-55 gallon containers in storage all labeled, dated as h.w. waste

Containers: Closed? Aisle space? Labeled? Releases? no

Dated? <90 days? Good condition?

Other H.W. Units: (Applicable Regulations)

Description of Unit _____


External Facility Condition _____

Facility Name DANA TRANSPORT, INC. EPA I.D.# NCD 074 505 050
Inspection Date JUNE 23, 1997

Site Deficiencies:

- 1.) 40 CFR _____
- 2.) 40 CFR _____
- 3.) 40 CFR _____
- 4.) 40 CFR _____
- 5.) 40 CFR _____
- 6.) 40 CFR _____

Recommendations/ Violations Continued: _____

 6-23-97
RCRA Inspector (date)

Robert F Hayes 06/23/97
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*

(5)
**YOU SHOULD RECEIVE ~~5~~ PAGE(S), INCLUDING THIS COVER SHEET. IF
YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 704-663-1699.**

SAMPLE TRAINING DOCUMENTS

Mr. Hayes,

- Let me know if you have any questions concerning this material. I will be sending you a copy of the "weather" inspection report in the mail.

Joe Parker

JOB DESCRIPTION/TRAINING RECORD FOR HAZARDOUS WASTE MANAGEMENT/DISPOSAL POSITIONS

40

Per 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. He is also responsible for responding to emergencies. The

above individual commenced these duties on or about _____ 19 ____.

DATE*	DESCRIPTION OF TRAINING (FOR FORMAL TRAINING) (FOR INFORMAL TRAINING, ENTER "ON THE JOB TRAINING", ENTER THE TITLE, A BRIEF DESCRIPTION AND THE NAME OF THE INSTRUCTOR(S).)	EMPLOYEE SIGNATURE

Specific Hazardous Waste Training Record

Employee name: _____ ID no.: _____

Job title: _____

I certify that I have received training in the following areas on the date(s) indicated, and that I understand all information presented:

Employee 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
_____	_____	_____	6. 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

Indicate subject areas in which the employee is not required to be trained by writing an "X" in the date column.

Employee Signature _____ Date _____

Trainer Signature _____ Date _____

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 Handler _____ 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. Job titles and job descriptions 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. How often: 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 until the 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

6. 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**

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

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 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

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Raleigh, North Carolina 27611-7687
Voice 919-733-4996



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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:
 - (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 \$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 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 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. *In Compliance*
 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 Compliance*

- 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. *In Compliance*
- 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." *In Compliance*
- 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. *Yes*
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, 1997, FILMS,*
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); *TWO Job titles: TOPE/Truck Cleaners Waste Mgmt. Techn.*
- (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); *Yes*
- (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); *FILMS, MANUALS*
- (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). *Yes*

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 coordinate Efforts between responders*
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 training documents in different areas. Need to consolidate material in Training program

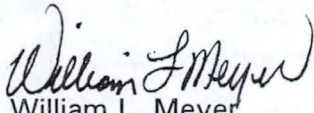
- F. Comply with 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0112. Dana shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is subject of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

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.

BY: William L Meyer

William L. Meyer, Director
Division of Solid Waste Management

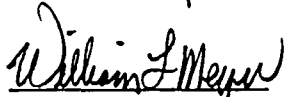
DATE: 5/21/97

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 21st day of May, 1997.



William L. Meyer, Director
Division of Solid Waste Management

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)

1. 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 no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
6. Is the regulatory program adversely affected? yes no

Harm Cell: Major 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 in compliance except for cited violation

Deviation cell: Major 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	\$ <u>5,500.00</u>
Penalty amount chosen:		\$ <u>5,500.00</u>
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. Adjusted initial penalty (amount from Part 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 (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)		\$ <u>5,550.00</u>

Remarks:

Compliance History :

Signed: William J. Meyer

Date: 5/21/96

2

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 storage accumulation and twelve (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 __

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:	<u>\$1,100.00</u> to	\$ <u>5,500.00</u>
Penalty amount chosen:		\$ <u>5,500.00</u>
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:		
5.	Adjusted initial penalty (amount from Part 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 (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)		\$ <u>5,500.00</u>

Remarks:

Compliance History :

Signed: William J Meyer

Date: 5/21/97

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 Part 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 (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)		\$ <u>5,550.00</u>

Remarks:

Compliance History :

Signed: William M. Meyer

Date: 5/21/97

4

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)

1. Quantity of waste involved Twelve (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 no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
 4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
 5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
 6. Is the regulatory program adversely affected? yes no
- Harm Cell: Major 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

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

Deviation cell: Major 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	<u>1,100.00 to \$ 5,500.00</u>
Penalty amount chosen:	<u>\$ 5,500.00</u>
Per Day Assessment:	

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)

	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 Part 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 (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)		\$ <u>5,500.00</u>

Remarks:

Compliance History :

Signed: William J Meyer

Date: 5/21/97

5

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

Name/ID: Dana Transport, Inc.
Regulation Violated: 40 CFR 268.7(a)(7)

Part I. Degree or Extent of Harm (actual or potential)

1. Quantity of waste involved Twelve (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

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	<u>275.00 to \$ 1,760.00</u>
Penalty amount chosen:	<u>\$ 1,760.00</u>
Per Day Assessment:	<u> </u>

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

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 Part II)		\$ <u>1,760.00</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 (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)		\$ <u>1,760.00</u>

Remarks:

Compliance History :

Signed: William J Meyer

Date: 5/27/97

PENALTY COMPUTATION CHECKLIST

Facility Name/ID: DANA TRANSPORT, INC. NCD 074 505 850

ADDRESS: 7254 MT. HOLLY RD. CHARLOTTE, N.C. 28214

- 1. Number of employees at the facility. 15
- 2. Number of residents in the area of the facility. Unknown
- 3. Distance to residents. Unknown; Facility located in an industrial setting
- 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. List all violations found at the facility:

- (A) 40 CFR 262.11
- (B) 40 CFR 262.34(a)(1)(i) ref to 40 CFR 265.173(a) and 40 CFR 265.174 (and) 15A NCAC 13A .0010(i)
- (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 CFR 265.16(c) - and - 40 CFR 265.16(d)(1)(2)(3)(4)
- (F) 40 CFR 262.34(a)(4) ref. Subpart C 40 CFR 265.31 - and - 40 CFR 265.35
- (G) 40 CFR 262.34(a)(4) ref. Subpart D 40 CFR 265.53(b) - and - 40 CFR 265.54
- (H) 40 CFR 268.7(a)(7)

(OVER)

SPECIFIC VIOLATION(S)

(A)

- Regulation violated: 40 CFR 262.11
- Unit(s) involved: (1) Two fifty-five gallon containers holding unknown material
 - Type of waste (waste code and constituents) UNKNOWN - POSSIBLE HAZARDOUS WASTE
 - Quantity of waste UNKNOWN - AT MOST, 110 GALLONS OF MATERIAL
 - Describe area in which violation occurred: (1) Fifty five gallon container in the Tank Washing Area noted as being "dormant" and (2) fifty five gallon container in the Tote Washing Area noted as having flash in it.
 - Specifics of violation: Both the facility needs to determine if the material in two separate 55 gallon containers, noted during the inspection, is a hazardous waste
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) Pictures taken
 - Date violation occurred? JAN. 28, 1997
 - Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

(B)

- Regulation violated: 40 CFR 262.34(a) (1) (i) ref. 40 CFR 265.173(a) ^{quid} 40 CFR 265.174 ^{quid} 15 ANCAC (3A.001d)
- Unit(s) involved: OPEN CONTAINER - SAT. Accumulation container, Weekly inspection - All H.W containers
 - Type of waste (waste code and constituents) DD01, DD08
 - Quantity of waste 1-55 gallon container used for Sat. Accum. and 12-55 gallon containers in storage
 - Describe area in which violation occurred: OPEN CONTAINER WAS NOT IN THE SATELLITE ACCUMULATION AREA AND NO WEEKLY INSPECTIONS WERE BEING CONDUCTED ON CONTAINERS OF HAZARDOUS WASTE IN STORAGE
 - Specifics of violation: OPEN CONTAINER AND WEEKLY INSPECTIONS ON HAZARDOUS WASTE CONTAINERS IN STORAGE
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) Pictures - no documentation could be provided as far as weekly inspections
 - Date violation occurred? JAN. 28, 1997
 - Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

(C)

- Regulation violated: 40 CFR 262.34(a)(2)
- Unit(s) involved: 12-55 gallon containers holding hazardous waste in storage
 - Type of waste (waste code and constituents) DD01, DD08
 - Quantity of waste 12-55 gallon containers
 - Describe area in which violation occurred: BOTH STORAGE AREAS - TANK WASHING AREA and the Tote Washing Area
 - Specifics of violation: HAZARDOUS WASTE CONTAINERS IN STORAGE WERE NOT MARKED WITH AN ACCUMULATION START DATE.
 - Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) Pictures to document violation
 - Date violation occurred? JAN. 28, 1997
 - Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

SPECIFIC VIOLATION(S)

(D)

- Regulation violated: 40 CFR 262.34(a)(3)
1. Unit(s) involved. 1-55 gallon container used for satellite accumulation
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste 1-55 gallon container - not full
 4. Describe area in which violation occurred. The container was noted in the satellite accumulation area in the TANK cleaning portion of the facility
 5. Specifics of violation. One 55-gallon container used for satellite accumulation, was noted as not being marked or labeled clearly with words "Hazardous Waste"
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) Pictures of the violation
 7. Date violation occurred? JAN. 28, 1997
 8. Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

(E)

- 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(a)(1) and 40 CFR 265.16(c)
- Regulation violated: and 40 CFR 265.16(d)(1)(2)(5)(4)
1. Unit(s) involved. PERSONNEL TRAINING
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste _____
 4. Describe area in which violation occurred. PERSONNEL TRAINING DOCUMENTATION
 5. Specifics of violation. Facility failed to develop a training program in the area of hazardous 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 training on hazardous waste management.
 7. Date violation occurred? JAN. 28, 1997
 8. Has facility been cited for this violation in past? yes no
Date(s) of past violation? _____

(F)

- Regulation violated: 40 CFR 262.34(a)(4) ref. Subpart C-40 CFR 265.31 and 40 CFR 265.35
1. Unit(s) involved. Releases of hazardous waste and aisle space for containers of haz. waste
 2. Type of waste (waste code and constituents) D001, D008 in storage
 3. Quantity of waste _____
 4. Describe area in which violation occurred. Releases of hazardous waste were noted on the side of 5 gallon pail located in the TOTE WASHING 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 release of hazardous waste and the facility failed to provide a sufficient amount of aisle space
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) in storage. 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)

- 7) Regulation violated: 40 CFR 262.34(a)(4) ref. Subpart D 40 CFR 265.53(b) and 40 CFR 265.54
1. Unit(s) involved. Contingency Plan
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste _____
 4. Describe area in which violation occurred. Contingency Plan documentation
 5. Specifics of violation. The facility failed to amend their Contingency Plan and send the revised copies to local agencies and state agencies.
 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 in reference to an amended contingency plan. The facility did produce an out-dated copy, however.
 7. Date violation occurred? JAN. 28, 1997
 8. Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

- (H) Regulation violated: 40 CFR 268.7(a)(7)
1. Unit(s) involved. LAND DISPOSAL NOTIFICATION
 2. Type of waste (waste code and constituents) D001, D008
 3. Quantity of waste _____
 4. Describe area in which violation occurred. Manifest Documentation
 5. Specifics of violation. The facility failed to retain on-site copies of Land Disposal Notifications for at least 5 years from the date waste was sent for disposal.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
During the paperwork audit, the facility could not provide copies of certain LDR notification for certain hazardous waste manifests.
 7. Date violation occurred? JAN. 28, 1997
 8. Has facility been cited for this violation in past? yes ___ no
Date(s) of past violation? _____

- Regulation violated: _____
1. Unit(s) involved. _____
 2. Type of waste (waste code and constituents) _____
 3. Quantity of waste _____
 4. Describe area in which violation occurred. _____
 5. Specifics of violation. _____
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) _____
 7. Date violation occurred? _____
 8. Has facility been cited for this violation in past? yes ___ no ___
Date(s) of past violation? _____

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: Seq#

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 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



March 19, 1997

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

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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 Mecklenburg Co., 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 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 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 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 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:
 - 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 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.

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 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 265.31 (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 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 265.53(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 amend 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 consideration of each of the factors above, penalties are assessed as follows: A. _____ ; B. _____; C. _____ ; D. _____ ; E. _____; F. _____ ; G. _____; and H. _____. Accordingly, a total penalty is imposed 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 .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 amended 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;
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 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 _____ day of _____, 1996.

William L. Meyer, Director
Division of Solid Waste Management

RCRA INSPECTION REPORT

1. FACILITY INFORMATION Dana Transport, Inc.
7254 Mt. Holly Road
Charlotte, N.C. 28214
NCD 074505850 Generator
2. FACILITY CONTACT 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. DATE OF INSPECTION 28 Jan 1997
5. PURPOSE OF INSPECTION To determine compliance with 40 CFR 262,
265, & 268.
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 occurring. 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 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 amendments 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 must 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 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 emanating 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.

- Recommendations: 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.

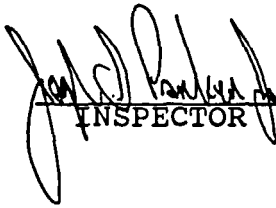
14) 40 CFR 262.34(c)(1)(ii) - Container Labeling

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.

 - WMS
INSPECTOR

FEB 21 1997
DATE

(CERTIFIED MAIL)
FACILITY CONTACT

RCRA INSPECTION REPORT

(x= violation, na= not applicable)

General Information:

Facility Name DANA TRANSPORT INC.
 Location 7854 MT HOLLY ROAD CHARLOTTE, N.C. 28214
 Mailing Address _____
 EPA ID.# NCD074505850 Phone # 704-399-3395
 Contact/ Title ROBERT HAYES - CONTAINER MANAGER
 Inspection Date JANUARY 28, 1997 Last Inspection FEBRUARY 19, 1993
 Status LQG Type of Inspection CEI
 Waste Management Specialist(s) JOSEPH PARKER, JESSE WELLS
 Present at Inspection ROBERT HAYES - CONTAINER MANAGER, GARY MASSEY, BILL HOCUVALM
 Type of Business TANKER WASHING FACILITY
 Waste Generated 0001, 0005, 0008

Manifests:

Approved Transporters? YES Approved TSD's? YES
 Signed Copies? YES Filled Out Correctly? YES
 * LDR Notification Attached? NO - 2 H.W. Manifests had NO LDR Attachments

 * Waste Minimization? How? NO WRITTEN PLAN ON SITE

Hazardous Waste Inspection Records:

Inspections On Storage Area NO Inspections for Containers to address any Management
 Inspections On H.W. Tanks N/A
 Inspection On Ancillary Equipment N/A

Contingency Plan:

On Site? YES
 * Any changes to facility/ processes or Emergency Coordinators since last review? YES - Not Completed
 Contingency Plan used? YES (if yes, was it adequate?) _____
 Agreements with Emergency Responders? NO NEW Agreements

Training Records:

Certified Training Documents Available? TRAINING NOT IN ACCORDANCE WITH RCRA REGULATIONS
 Any New Employees Since Last Review? YES, TRAINED AS FAR AS LOCAL OPERATIONS
 Evidence Of Improper/ Inadequate Training? Improper documentation

Transporters

J.B. HUNT SPECIAL COMMODITIES ALD 981 908551
 HAZ MAT INV. GROUP NYD 980 769 947

TSDS

SCW 077 995 488 SAFETY-KLEAN
 WASTE TECHNOLOGIES INDUSTRIES OMD 980 6135211

Facility Name DANA TRANSPORT INC EPA I.D.# NCD 674 505 850
Inspection Date JAN 28, 1997

Employee Interview:

Names(s) _____ Trained _____

Annual Report Submitted? _____ Copy At Facility? _____

Emergency Preparedness:

Facility Maintained And Operated To Prevent Releases? Releases present on containers (5 gallon)
Internal Communications Or Alarm Present? AIR HORNS + P.A. SYSTEM
Device In Area Of Operation To Summon Outside Help? PHONES IN FACILITY
Portable Fire Extinguishers And/ Or Fire Control Equipment? YES
Spill Control Equipment? YES, Spill Absorbant material
Adequate Water Volume, Foam, Equipment, Or Auto Sprinkler? NO SPRINKLERS
All Equipment/ Alarms Tested And Maintained? N/A
All Personnel Handling H.W. Have Access To Alarm/ Device? YES
Aisle Space In Area Of Facility Operations? NONE for 55 gallon containers of H.W. in storage

Satellite Accumulation Area(s) 1 Location(s) 1 - 55 gallon container used for SW. Accumulation - NOT CLOSED, NO HAZ. WASTE LABEL

Containers: Closed? Labeled? <55 gal. Stored <3 days if full? _____

Tank cleaning area
Take Area

Storage Area(s): 3 Description HAZARDOUS WASTE CONTAINERS ARE MIXED IN WITH NON-HAZ. - UNABLE TO VIEW 2-55 gallon containers holding HAZ. WASTE
1 - 55 gallon container - No Accum. Serial Date

Containers: Closed? Aisle space? No Labeled? Releases? _____

Dated? _____ <90 days? _____ Good condition? _____

Other H.W. Units: (Applicable Regulations)

Description of Unit Oil/Water Separator - BACK, No. 2 Fuel Oil Tank - BACK

External Facility Condition Numerous containers (empty) throughout facility and outside

Facility Name DANA TRANSPORT

EPA I.D.# NCD

Inspection Date JAN. 28, 1997

Site Deficiencies:

- 1.) 40 CFR _____
- 2.) 40 CFR _____
- 3.) 40 CFR _____
- 4.) 40 CFR _____
- 5.) 40 CFR _____
- 6.) 40 CFR _____

* Recommendations/ Violations Continued: Refered Computer generated
Inspection Form

[Signature] 1-28-97
RCRA Inspector (date)

Robert Hayes
Facility Contact (date)

Follow Up Inspection:

Comments _____

RCRA Inspector (date)

Facility Contact (date)

Oil/Water Separator - Clean up area around the unit - Assess Area surrounding unit

#2 Fuel Oil TANK - Need Clean out containment area - and assess surrounding ground.

WASTE DETERMINATION ON CONTAINER holding "Degreaser" - Mr. Hayes specified that they do NOT use this material anymore - ... Need to dispose of.

TOTE AREA -

5 gallon bucket of INK - AS specified by Mr. Hayes - A H.W. by Mr. Hayes's Determination
Releases, OPEN CONTAINER, NO LABEL (H.W.)

WASTE DETERMINATION - ON OPEN 55 gallon Container - emitting a solvent odor noted as trash by Mr. Hayes

<u>Haz. Waste Manifest #</u>	<u>Need LDR</u>	<u>Need signed copy</u>
94004 - 9/8/94 ^{VOID} (JP) found copy	✓ (JP)	
08296 - 08/09/96	✓	
08396 - 11/5/96	✓	
62102 - 6/24/96 (JP) VOID LDR found	✓ (JP)	

Rec'd

**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.

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 Hayes

Fax # 704-399-3303

800-796-3262

DRAFT

May , 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

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

Re: Dana Transport, Inc.
NCD 074 505 850

JANUARY 28, 1997

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, 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 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 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.

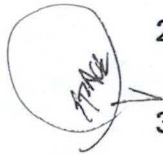
Dana is in violation of 40 CFR 262.11, codified at 15A NCAC 13A .0107, in that the facility generated solid waste, as defined in 40 CFR 261.2 and failed to determine if the waste was a hazardous waste. Specifically, Dana failed to conduct a waste determination on one(1) 55-gallon container located in 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, 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).
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 inspection records maintained at the facility. *regarding Haz. Waste*



- 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 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 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.
2. 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

Transport, Inc.

NOTICE OF RIGHT TO APPEAL

Transport, Inc.'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;
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 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)

Name/ID: Dana Transport, Inc.
Regulation Violated: 40 CFR 262.11

Part I. Degree or Extent of Harm (actual or potential)

1. 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 no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
6. Is the regulatory program adversely affected? yes no

Harm Cell: Major 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 in compliance except for cited violation

Deviation cell: Major 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.

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 Part 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 (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)		\$ <u>5,550.00</u>

Remarks:

Compliance History :

Signed: _____

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)

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 D001 and D008.
3. Is human life or health potentially threatened? yes no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
6. Is the regulatory program adversely affected? yes no

Harm Cell: Major 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 in compliance except for cited violation

Deviation cell: Major Moderate 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:		\$ 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.

Major/Mod.

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 Part 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 (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)		\$ <u>5,500.00</u>

Remarks:

Compliance History :

Signed: _____

Date: _____

**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 Twelve (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 Cell: Major X Moderate Minor

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	<u>1,100.00</u> to <u>\$ 5,500.00</u>
Penalty amount chosen:	<u>\$ 5,500.00</u>
Per Day Assessment:	<u> </u>

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.

major/major



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 Part 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 (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)		\$ <u>5,550.00</u>

Remarks:

Compliance History :

Signed: _____

Date: _____

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

Name/ID: Dana Transport 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)

1. Quantity of waste involved Twelve (12) fifty-five gallon containers
 2. Toxicity of waste involved D001 and D008.
 3. Is human life or health potentially threatened? yes no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
 4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
 5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
 6. Is the regulatory program adversely affected? yes no
- Harm Cell: Major 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 in compliance except for cited violation

Deviation cell: Major 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	<u>1,100.00 to \$ 5,500.00</u>
Penalty amount chosen:	<u>\$ 5,500.00</u>
Per Day Assessment:	

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)

	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 Part 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 (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)		\$ <u>5,500.00</u>

Remarks:

Compliance History :

Signed: _____

Date: _____

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

Name/ID: Dana Transport, Inc.
Regulation Violated: 40 CFR 268.7(a)(7)

Part I. Degree or Extent of Harm (actual or potential)

1. Quantity of waste involved Twelve (12) fifty-five gallon containers
2. Toxicity of waste involved D001 and D008
3. Is human life or health potentially threatened? yes no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
6. Is the regulatory program adversely affected? yes no

Harm Cell: Major Moderate 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 in compliance except for cited violation

Deviation cell: Major 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 Disposal Restriction for five (5) years.

MATRIX CELL RANGE	<u>275.00 to \$ 1,760.00</u>
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.

mod/mod.

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 Part II)		\$ <u>1,760.00</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 (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)		\$ <u>1,760.00</u>

Remarks:

Compliance History :

Signed: _____

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: 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)

Facility Name: DANA TRANSPORT, INC.
 Address: 7254 MT. MOLLY RD.
CHARLOTTE, N.C. 28214
 Client Name: _____
 Facility Contact: ROBERT HAYES
 Health/Safety Contact: _____
 SSP Prepared/Reviewed By: J. PARKER

EPA#: NCD 074 505 850
 Phone# 704-399-3315
 Phone# _____
 Phone# _____
 Date(s): JAN 28, 1997

B. PROJECT DESCRIPTION

X	TYPE	DATE	X	ACTIVITY	DATE
	CME		X	INSPECTION	2-28-97
X	CEI	2-28-97		DRUM/SLUDGE SAMPLING	
	CDI			SOIL/SEDIMENT SAMPLING	
	RFI			GROUNDWATER SAMPLING	
	RFA			SURFACE WATER SAMPLING	
	O & M			AIR SAMPLING	
	SITE INVESTIGATION/ VISIT			OTHER:	
	TECHNICAL ASSISTANCE				

Project Activity Summary: COMPLIANCE EVALUATION INSPECTION

(C) EMERGENCY INFORMATION

Ambulance: Meck. Co.
 Hospital: Meck. Co.
 Police: Meck. Co.
 Fire Department: Meck. Co.
 Fire and Emergency Signals reviewed:
 Site Evacuation plan reviewed:

Telephone# 911
 Telephone# 911
 Telephone# 911
 Telephone# 911

(D) FACILITY DESCRIPTION

Manufacturing Process Description: Facility operates as tanker washing facility

Site Topography:

Mountains ___ Rivers ___ Valley ___ Level ___ Slopes ___ Urban Facility Other ___
 Special Access Requirements: _____

Possible Physical Hazards:

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		/			

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		
	B	C	D		B	C	D
CLOTHING			/	RESPIRATORY PROTECTION		/	
Coveralls			/	Cloth Respirator			/
Tyvek			/	Full-face Air-purifying Respirator			/
Coated Tyvek			/	Self-contained Breathing Apparatus			/
Saranex			/	HANDS/ARMS			/
HEAD, FACE AND EYES			/	Vinyl Gloves			/
Hardhat			/	Latex Gloves			/
Safety Glasses			/	Nitrile Gloves			/
Goggles			/	PVC Gloves			/
Splash Guard			/	Duct Tape			/
FOOT PROTECTION			/	OTHER:			/
Steel-toed Safety Boots			/				/
Chemical-resistant Boot Covers			/				/

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.

(H) DECONTAMINATION PROCEDURES

Most equipment used by HWS personnel is disposable; and thus, should be discarded upon concluding the project, inspection, etc. Equipment such as respirators, augers, shovels, etc. which are re-usable shall be decontaminated according to EPA and HWS protocols.

NOTE: CONTAMINATED DISPOSABLE EQUIPMENT SHOULD REMAIN AT THE SITE OF ORIGIN.

(I) AIR/ENVIRONMENTAL MONITORING

This section lists the monitoring equipment which may be used by HWS personnel while on site and the action levels which may facilitate upgrading to higher levels of PPE.

Monitoring Instrument	Action Level		Monitoring Interval	D→C (ppm)	C→B (ppm)	Stop Work (ppm)
	YES	NO				
PID (PhotoVac Microtip)						
FID (Organic Vapor Analyzer)						
Infrared Spectrophotometer						
Combustible Gas Indicator						
Colorimetric Detector Tubes						
Other:						

Party Conducting Monitoring: _____
COMMENTS: _____

(J) COMMUNICATION PROCEDURES (If applicable)

HWS Personnel, in the process of conducting operations beyond routine inspections, shall employ the buddy system and remain in communication or in sight of their partner (a HWS employee). All accidents, injuries and emergencies shall be reported to the HWS Health and Safety Coordinator. The HWS-H&S Coordinator will indicate the need to evacuate the site by verbal command. A telephone on site will be used for contacting emergency personnel and other reporting.


Telephone location: _____
It's telephone #: _____

Emergency Communication

ACTION	MEANING
Hand gripping throat	Out of air, cannot breath, choking
Grip partner's wrist or place both arms around waist	Leave the area quickly, no debate
Hands on top of head	Need assistance
Thumbs up	Ok, all right, I understand
Thumbs down	No negative

(K) SITE SAFETY PLAN REVIEW VERIFICATION

verifying that participant has reviewed site contingency plan or HWS-SSP.
Site Activity Participants:

NAME:	TITLE:	SIGNATURE:	DATE:
Joseph Parker	Waste Mgmt. Specialist		2-28-97
Jesse Wells	Waste Mgmt. Specialist		

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: Seq#

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 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

May , 1997

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

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

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, 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 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 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 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).
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. 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.
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 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.

F. _____

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.O. Box 29603, Raleigh, 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:

How Many?

- A. Comply with 40 CFR 262.11, codified at 15A NCAC 13A .0107. Dana shall determine if the material in two separate fifty-five-gallon containers, noted during the inspection, is a hazardous waste. *1 CONTAINER*
- 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.
- 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 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:
 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 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

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

DRAFT

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
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 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: _____

ORIGINAL

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

ORIGINAL

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
- Toxicity of waste involved unknown
- Is human life or health potentially threatened? yes no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
- Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
- Are any environmental media potentially threatened? yes no
air groundwater surface water soil
- Is the regulatory program adversely affected? yes no

Harm Cell: Major Moderate Minor

Remarks: Dana accumulates hazardous waste in a container and failed to properly identify the hazardous waste classification.

Part II. Deviation from Regulations

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

Deviation cell: Major 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.

Major/Sign.

Part III. Penalty Adjustment (optional)

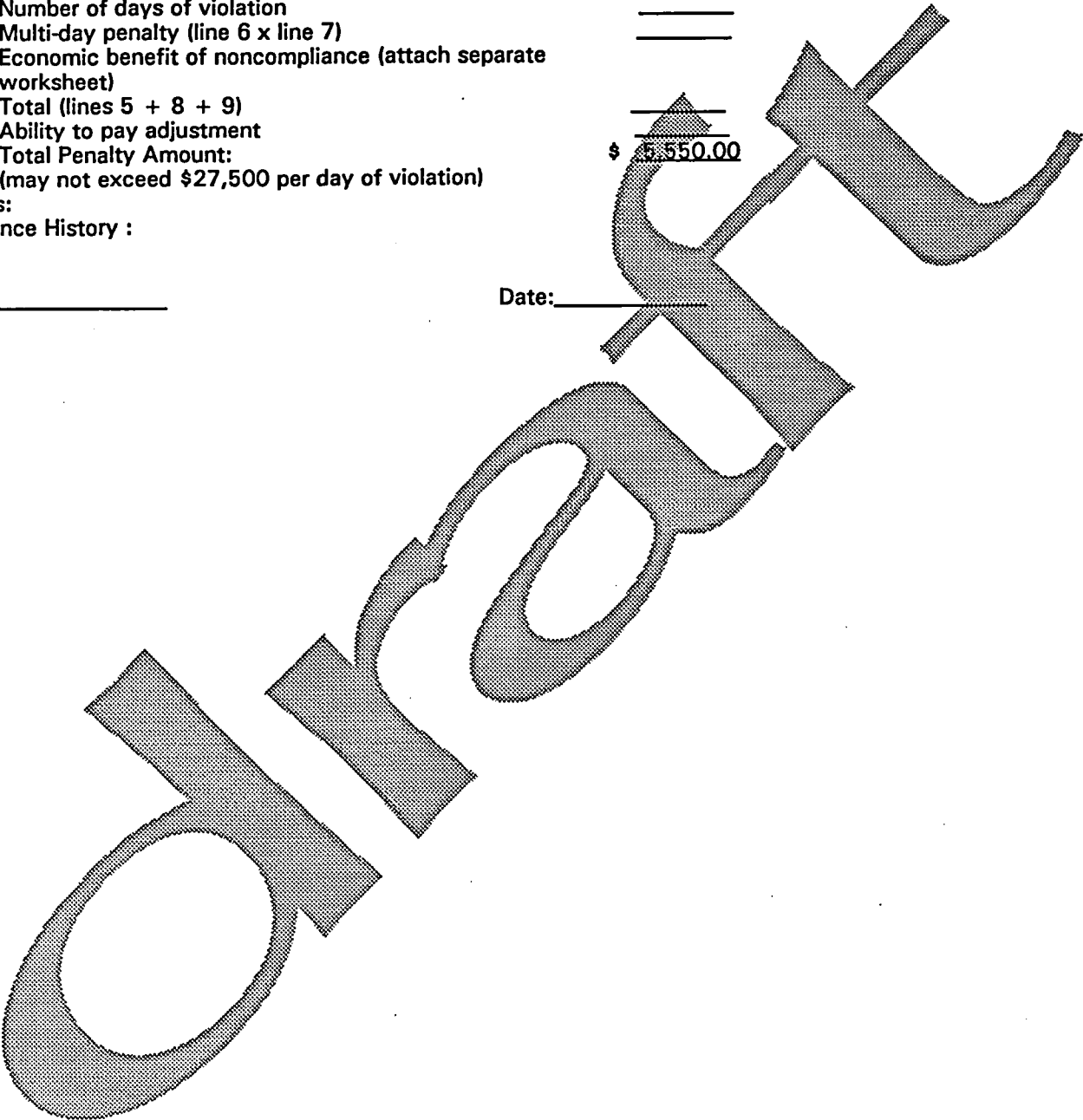
	Percentage change	Dollar Amount
1. Good faith efforts to comply/ lack of good faith:	_____	_____
2. Degree of willfulness/neglect:	_____	_____
3. History of noncompliance/ compliance:	_____	_____
4. Other unique factors:		
5. Adjusted initial penalty (amount from Part II)		\$ <u>5,500.00</u>
6. Adjusted 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 (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)		\$ <u>5,550.00</u>

Remarks:

Compliance History :

Signed: _____

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)

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.
3. Is human life or health potentially threatened? yes no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
6. Is the regulatory program adversely affected? yes no

Harm Cell: Major 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

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

Deviation cell: Major Moderate 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: \$ 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.

Major/mod.

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 Part 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 (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)		\$ <u>5,500.00</u>

Remarks:

Compliance History :

Signed: _____

Date: _____

DRAFT

**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 Twelve (12) fifty-five gallon containers
2. Toxicity of waste involved D001 and D008.
3. Is human life or health potentially threatened? yes no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
6. Is the regulatory program adversely affected? yes no

Harm Cell: Major Moderate Minor

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 significant in compliance except for cited violation

Deviation cell: Major 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.

Part III. Penalty Adjustment (optional)

Percentage change Dollar Amount

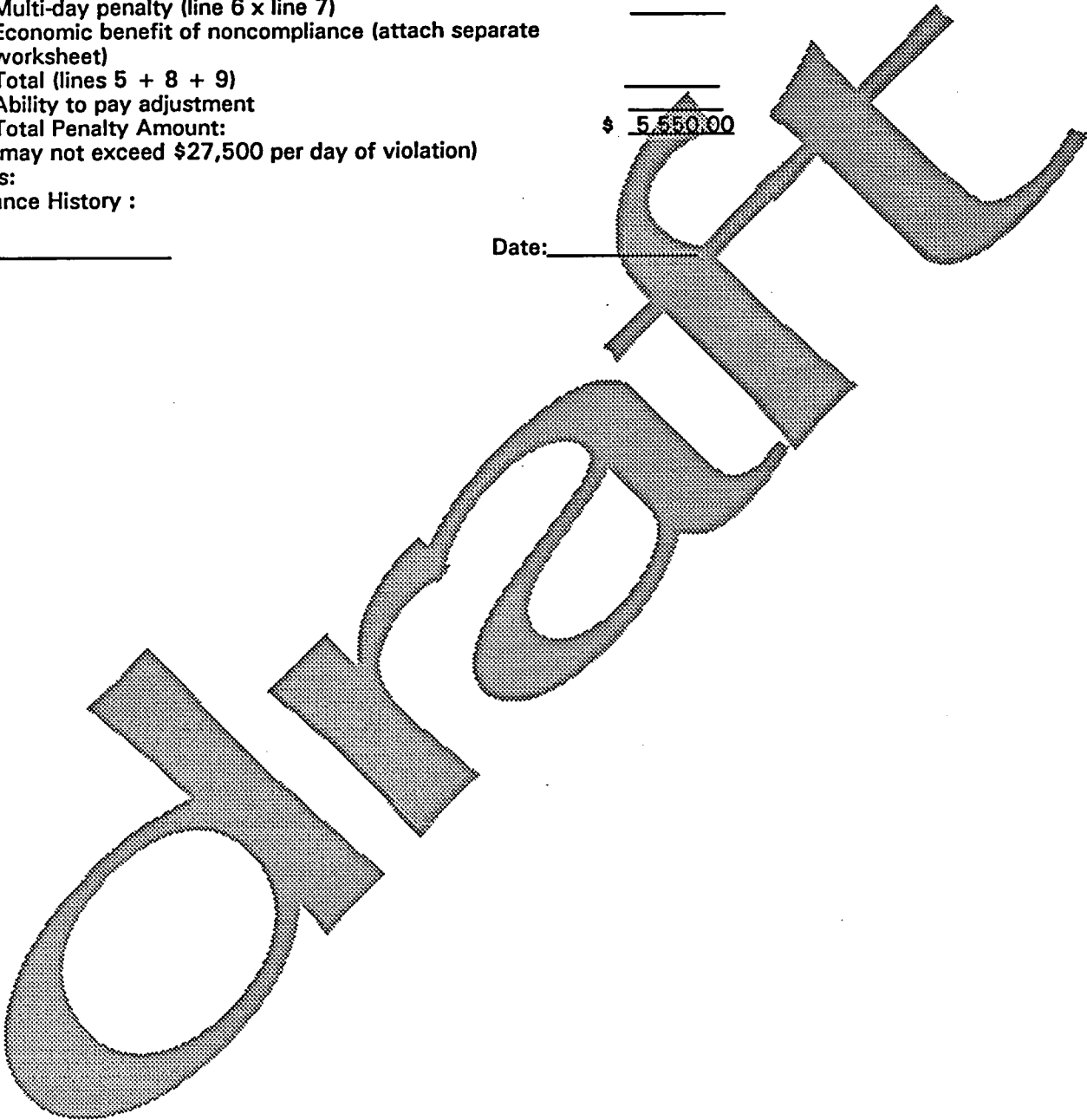
- | | | | |
|-----|---|-------|--------------------|
| 1. | Good faith efforts to comply/
lack of good faith: | _____ | _____ |
| 2. | Degree of willfulness/neglect: | _____ | _____ |
| 3. | History of noncompliance/
compliance: | _____ | _____ |
| 4. | Other unique factors: | | |
| 5. | Adjusted initial penalty (amount from Part 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 (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) | | \$ <u>5,550.00</u> |

Remarks:

Compliance History :

Signed: _____

Date: _____



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

Name/ID: Dana Transport 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)

1. Quantity of waste involved Twelve (12)fifty-five gallon containers
 2. Toxicity of waste involved D001 and D008.
 3. Is human life or health potentially threatened? yes no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
 4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
 5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
 6. Is the regulatory program adversely affected? yes no
- Harm Cell: Major 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, 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 in compliance except for cited violation

Deviation cell: Major 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 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.

Part III. Penalty Adjustment (optional)

Percentage change Dollar Amount

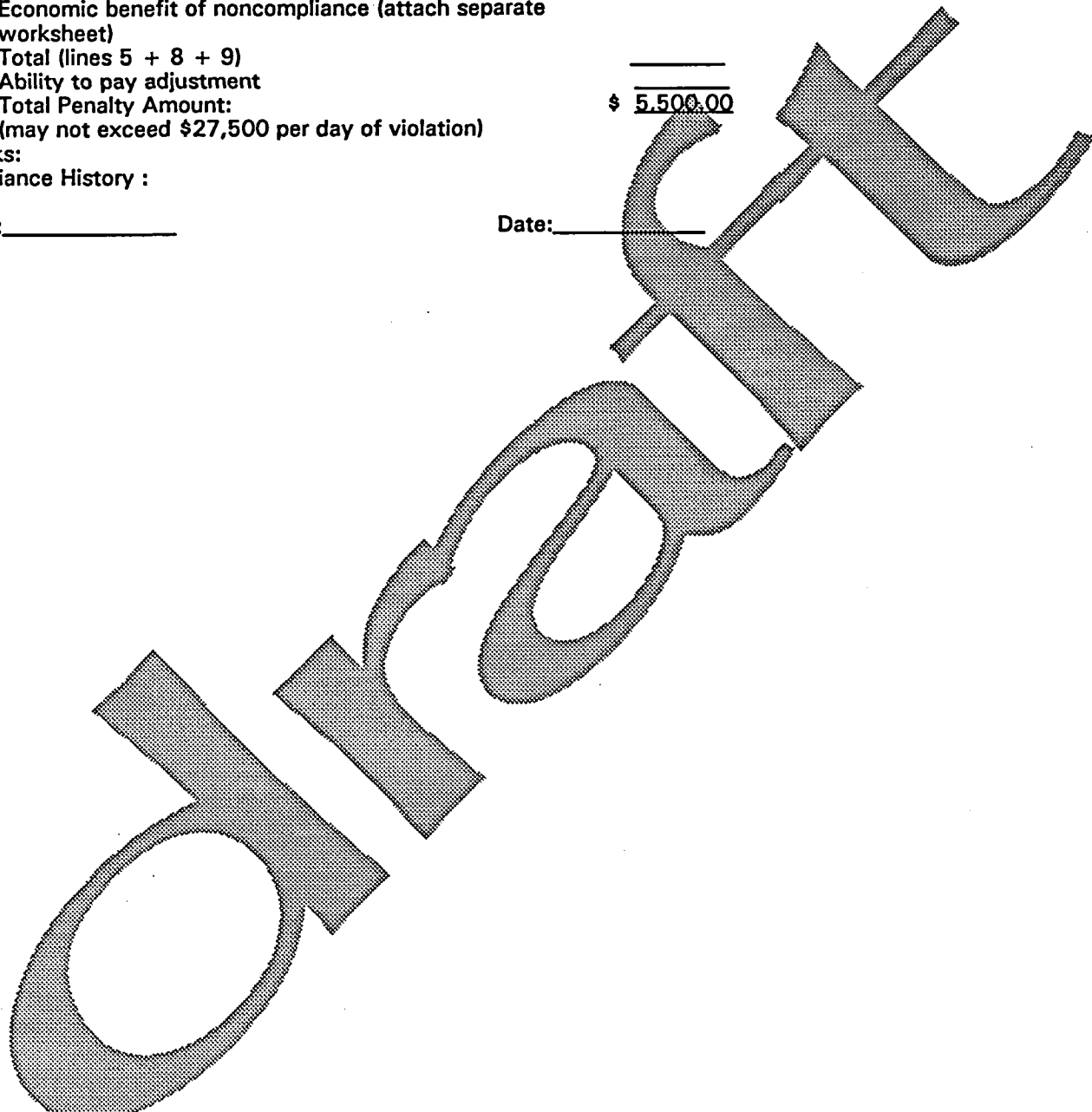
- | | | | |
|-----|---|-------|--------------------|
| 1. | Good faith efforts to comply/
lack of good faith: | _____ | _____ |
| 2. | Degree of willfulness/neglect: | _____ | _____ |
| 3. | History of noncompliance/
compliance: | _____ | _____ |
| 4. | Other unique factors: | | |
| 5. | Adjusted initial penalty (amount from Part 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 (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) | | \$ <u>5,500.00</u> |

Remarks:

Compliance History :

Signed: _____

Date: _____



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

Name/ID: Dana Transport, Inc.
Regulation Violated: 40 CFR 268.7(a)(7)

Part I. Degree or Extent of Harm (actual or potential)

1. Quantity of waste involved Twelve (12) fifty-five gallon containers.
2. Toxicity of waste involved D001 and D008.
3. Is human life or health potentially threatened? yes no
Distance to residences unknown
Number of people involved 15 employees
Media for exposure: air groundwater surface water direct contact
4. Are other organisms potentially threatened? yes no
Media for exposure: air ground water surface water direct contact
5. Are any environmental media potentially threatened? yes no
air groundwater surface water soil
6. Is the regulatory program adversely affected? yes no

Harm Cell: Major Moderate 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

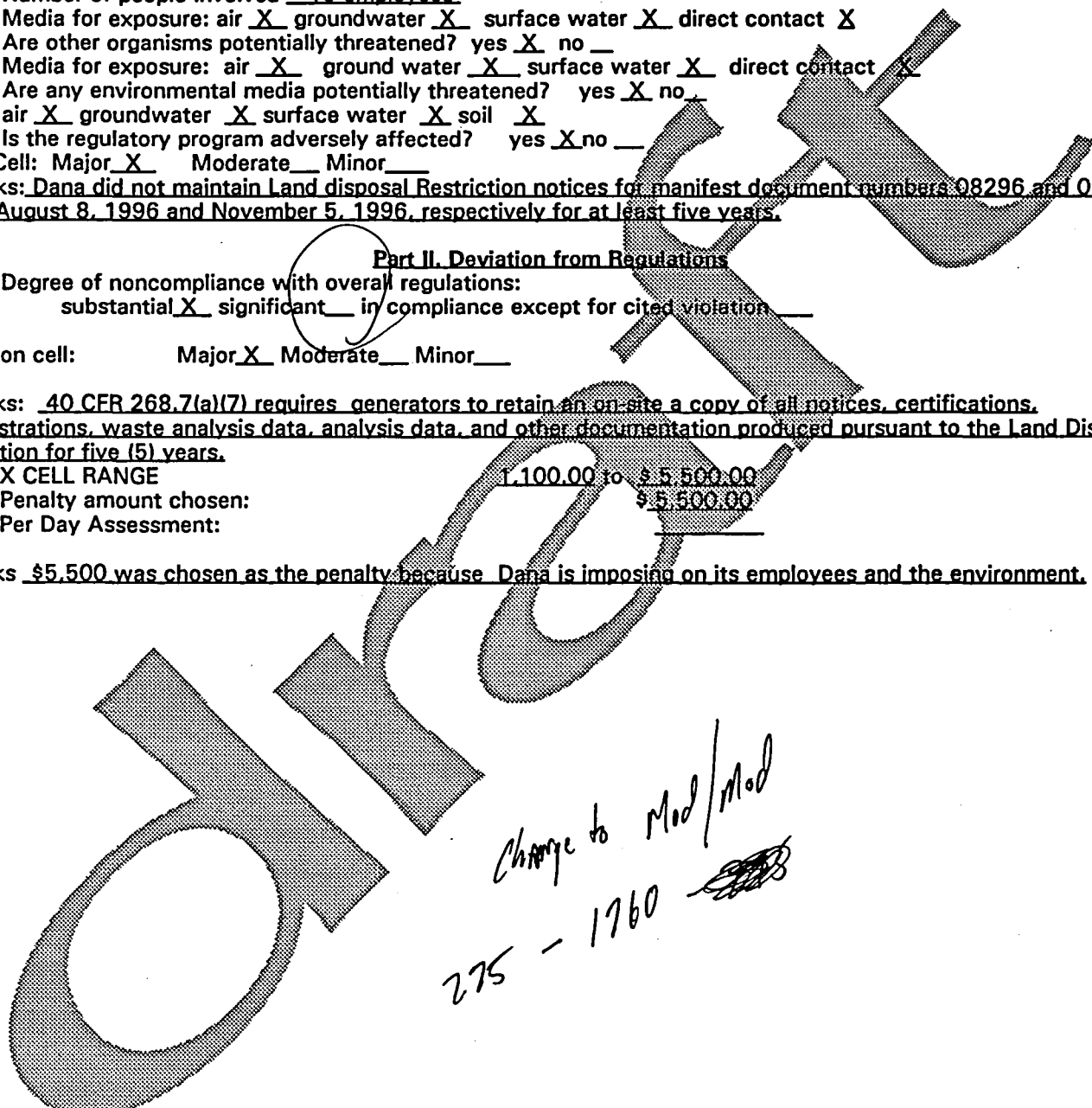
1. Degree of noncompliance with overall regulations:
substantial significant in compliance except for cited violation

Deviation cell: Major 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 Disposal Restriction for five (5) years.

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

Remarks \$5,500 was chosen as the penalty because Dana is imposing on its employees and the environment.



*Change to Mod/Mod
275 - 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/		

- compliance: _____
4. Other unique factors: _____
 5. Adjusted initial penalty (amount from Part II) \$ 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 (attach separate worksheet) _____
 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 violation)

Remarks:
Compliance History :

Signed: _____

Date: _____

DRAFT

RCRA INSPECTION REPORT

(x= violation, na= not applicable)

General Information:

Facility Name DANA TRANSPORT, INC.
Location 7254 MT. HOLLY ROAD, CHARLOTTE, N.C. 28214
Mailing Address _____
EPA ID.# NCD 074 505 850 Phone # 704-399-3395
Contact/ Title ROBERT HAYES
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, DOOR, FROGS

* Condition A - Waste Determination on unknown containers - Completed, sent off as Hz. Waste

Manifests:

Approved Transporters? _____ Approved TSD's? _____
Signed Copies? _____ Filled Out Correctly? _____

* LDR Notification Attached? the facility has obtained LDR notices for manifest #'s 08296(8-9-96) and 08396(11-5-96). IN COMPLIANCE WITH CONDITION F

Waste Minimization? _____ How? _____

* Hazardous Waste Inspection Records: Conditions B2 + B3

Inspections On Storage Area GOOD INSPECTIONS. IN COMPLIANCE WITH CONDITION B-2+3
Inspections On H.W. Tanks N/A
Inspection On Ancillary Equipment N/A

* 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 Cont. Plan was sent to Fire Dept., Police Dept., + Hospital.

* Training Records: Condition E1, E2, and E3

Certified Training Documents Available? YES, need to organize better.
Any New Employees Since Last Review? NO
Evidence Of Improper/ Inadequate Training? All employees have been trained.

Contingency Plan Content - Facility needs to document what agreements they have with responding emergency services, i.e. Fire Dept., Police, Hospital. What roles will they fill in the event of an emergency.

TRAINING RECORDS - The facility has the appropriate type of training and documentation onsite. I recommend that they organize their training documentation into one manual, specific for HAZ. WASTE.

Facility Name DANA TRANSPORT, INC. EPA ID.# NCD 074 505 850
Inspection Date JUNE 23, 1997

Employee Interview: n/a
Names(s) _____ Trained _____

Annual Report Submitted? n/a Copy At Facility? _____

Emergency Preparedness:

Facility Maintained And Operated To Prevent Releases? Yes

Internal Communications Or Alarm Present? _____

Device In Area Of Operation To Summon Outside Help? Yes

Portable Fire Extinguishers And/ Or Fire Control Equipment? Yes

Spill Control Equipment? Yes

Adequate Water Volume, Foam, Equipment, Or Auto Sprinkler? _____

All Equipment/ Alarms Tested And Maintained? Yes

All Personnel Handling H.W. Have Access To Alarm/ Device? Yes

Aisle Space In Area Of Facility Operations? Yes

Satellite Accumulation Area(s) 2 Location(s) Both satellite Areas HAVE 1-55 gallon containers used for accumulation purposes - Both containers are properly labeled as a hazardous waste and closed.

Containers: Closed? Labeled? <55 gal. Stored <3 days if full? _____

Storage Area(s): 1 Description During the reinspection, 17-55 gallon containers were observed to be in storage. All containers were properly labeled as a haz. waste, dated with an accumulation start dated, and closed

Containers: Closed? Aisle space? Labeled? Releases? None

Dated? <90 days? Good condition?

Other H.W. Units: (Applicable Regulations)

Description of Unit _____

External Facility Condition The facility has improved since their last inspection, in handling their hazardous waste onsite.

Facility Name DANA TRANSPORT, INC.
Inspection Date JUNE 23, 1997

EPA I.D.# NCD 074 505 850

Site Deficiencies:

- 1.) 40 CFR _____
- 2.) 40 CFR _____
- 3.) 40 CFR _____
- 4.) 40 CFR _____
- 5.) 40 CFR _____
- 6.) 40 CFR _____

Recommendations/ ~~Notes~~ Continued:

- ① Amend the facility's Contingency Plan to reflect the agreements between responding emergency agencies. When this is done, document that these revisions have been sent to the Fire Dept., Police Dept., and Hospital.
- ② The Facility needs to organize their training documents into one specific document for hazardous waste management. When these items are completed, send this office copies of these updated documents.

 6-23-97
RCRA Inspector (date)

(CERTIFIED MAIL)
Facility Contact (date)

Follow Up Inspection:

Comments _____

RCRA Inspector (date)

Facility Contact (date)



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. SIC: 4213 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
- B. 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*

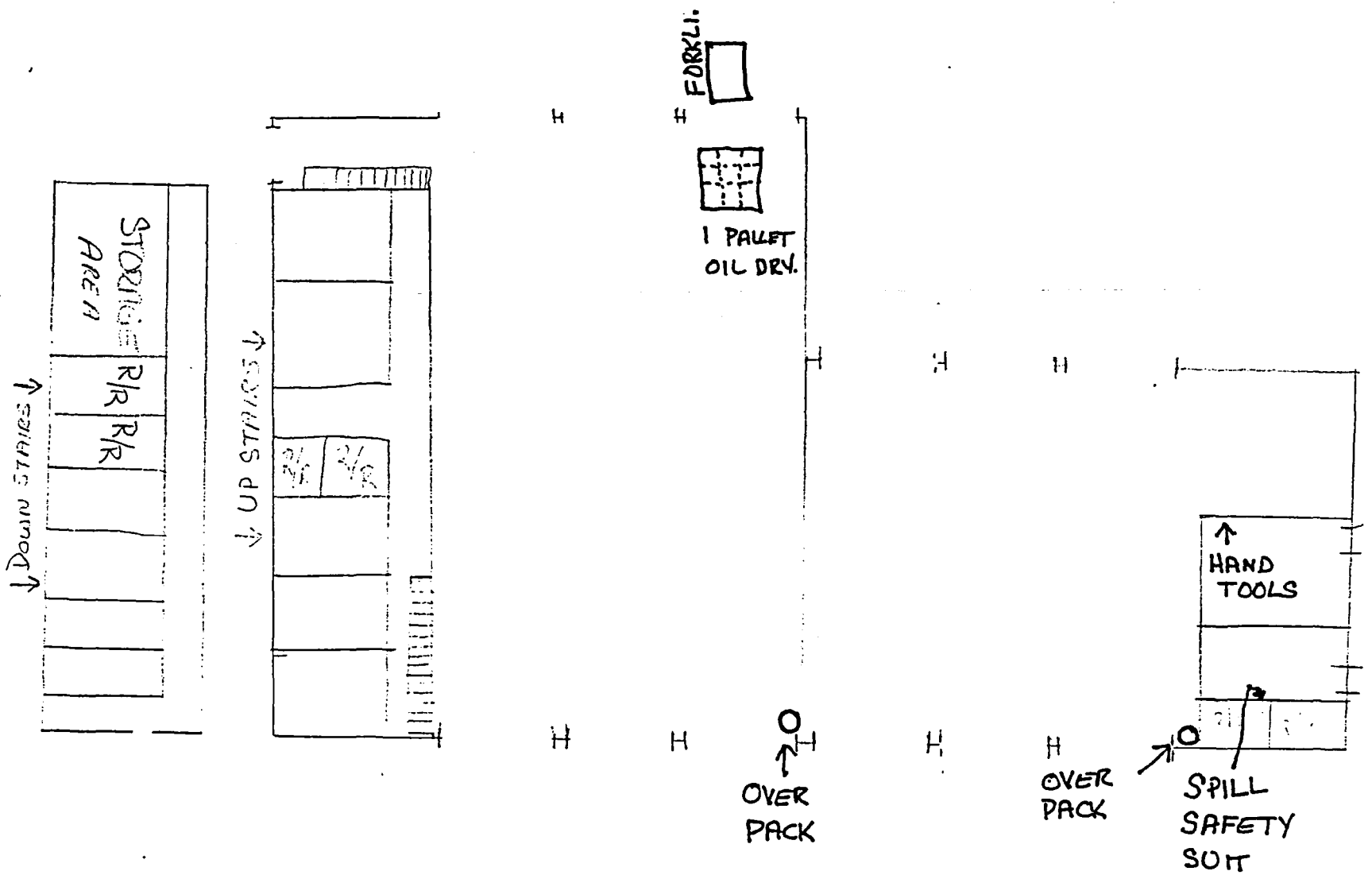
- a. Initiate the same procedures as listed in D 1. However, further action should be taken to contain the spill or release. Moreover, abatement contractor should be notified to initiate release cleanup operations.

B.1. *Spill Response Equipment*

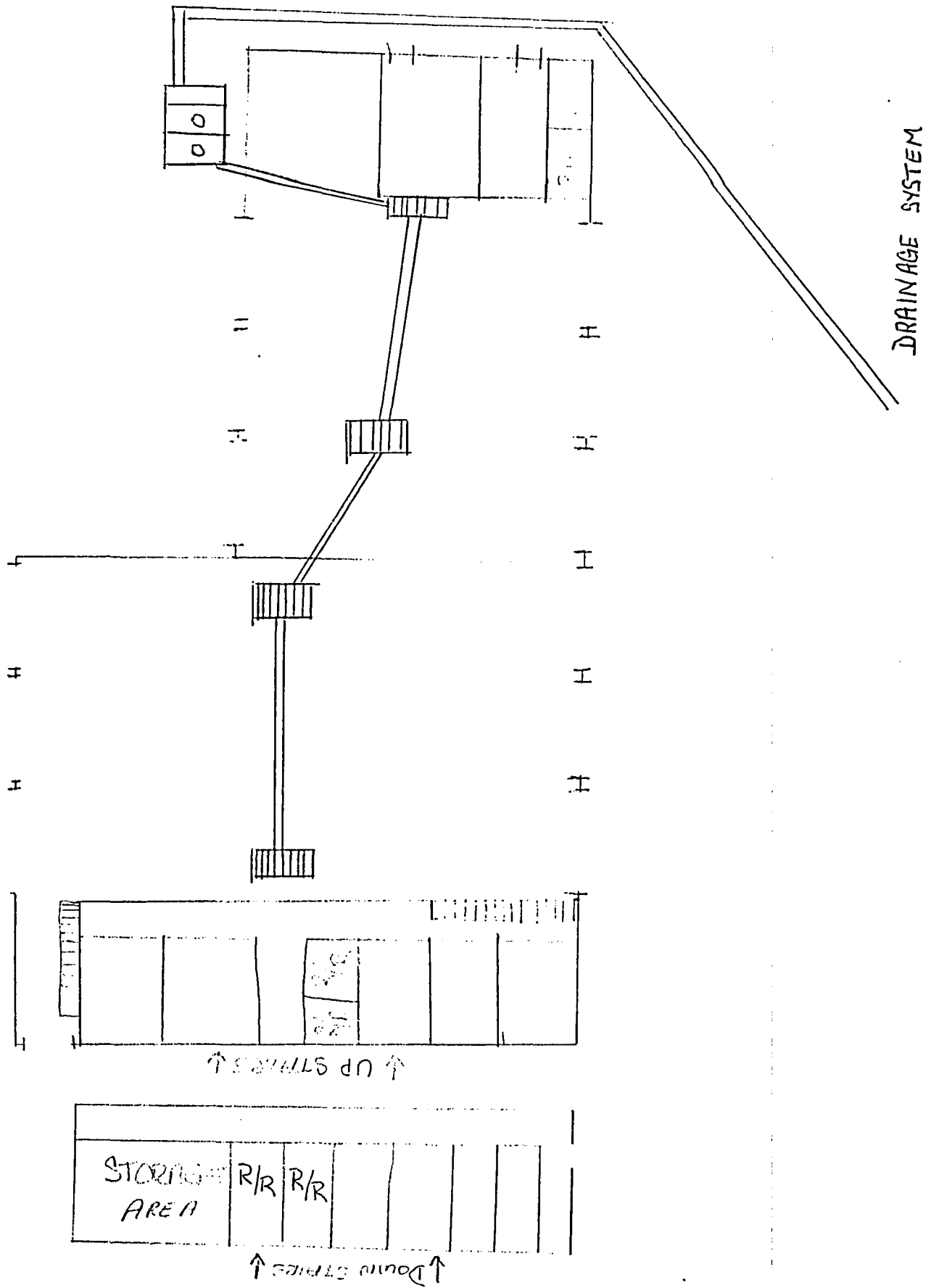
Front loader, fork lift, oil dry, all hand tools needed.

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



DRAINAGE SYSTEM

↑ UP STAIRS ↓

↑ DOWN STAIRS ↓

STORAGE AREA R/R R/R

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

<u>Item/Location</u>	<u>Size Quantity</u>	<u>Use</u>
Fire Extinguisher Figure 1	10 lb/11	Extinguish Class A, B or C fires
First aid kit/oxygen/fresh air Office		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 Drum Room (Cleaning Rack Dry Bed)	2	Spreading Soil and ABSORBENT Clean up
55 Gallon Drums Shop	3	For disposal of contaminated after spill clean-up
Tool Box Pump Room	1	Fixing leaks

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:

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- 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!

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 log.

- 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 appear in the order in which they will assume responsibility/take action at an emergency incident.

Primary: Bill Horvath
Day 704-399-3395
Home 704-545-4395
Beeper 1-800-283-1212
 pin# 8002480

Secondary: Bob Hayes
Day 704-399-3395
Home 704-895-0979
Beeper 704-354-0706

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

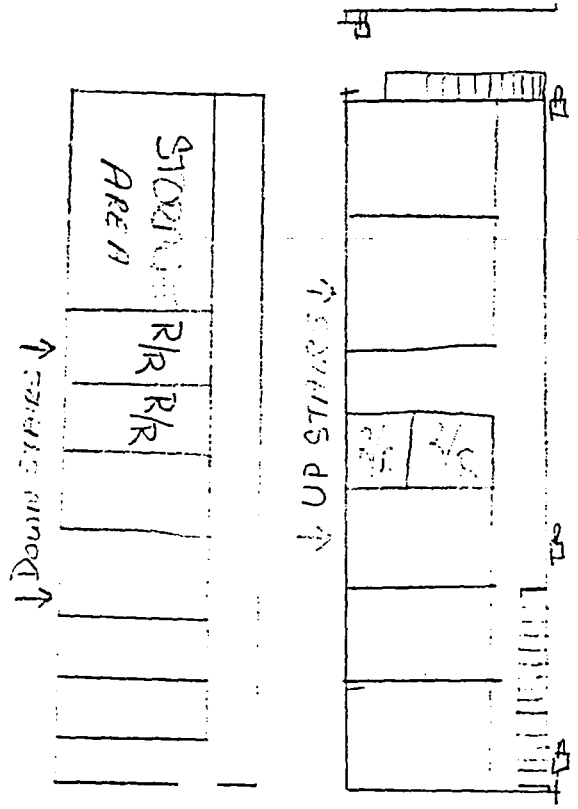
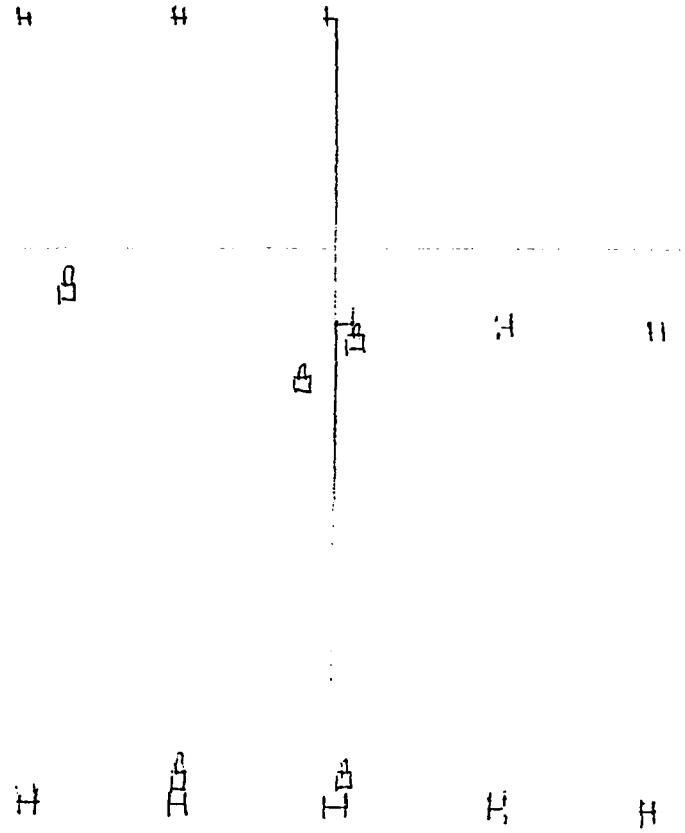
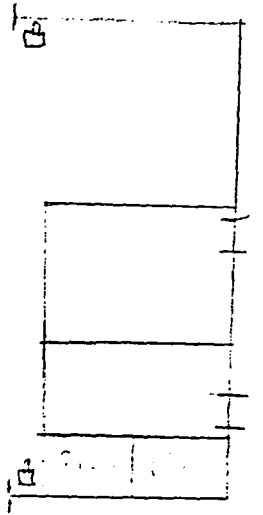
Phone #: "911" or 336-3190
Address: 618 North College Street
Charlotte, NC 28202

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



☐ FIRE EXTINGUISHING BOTTLES

An evacuation drill will be held for the site at 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 log.

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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*

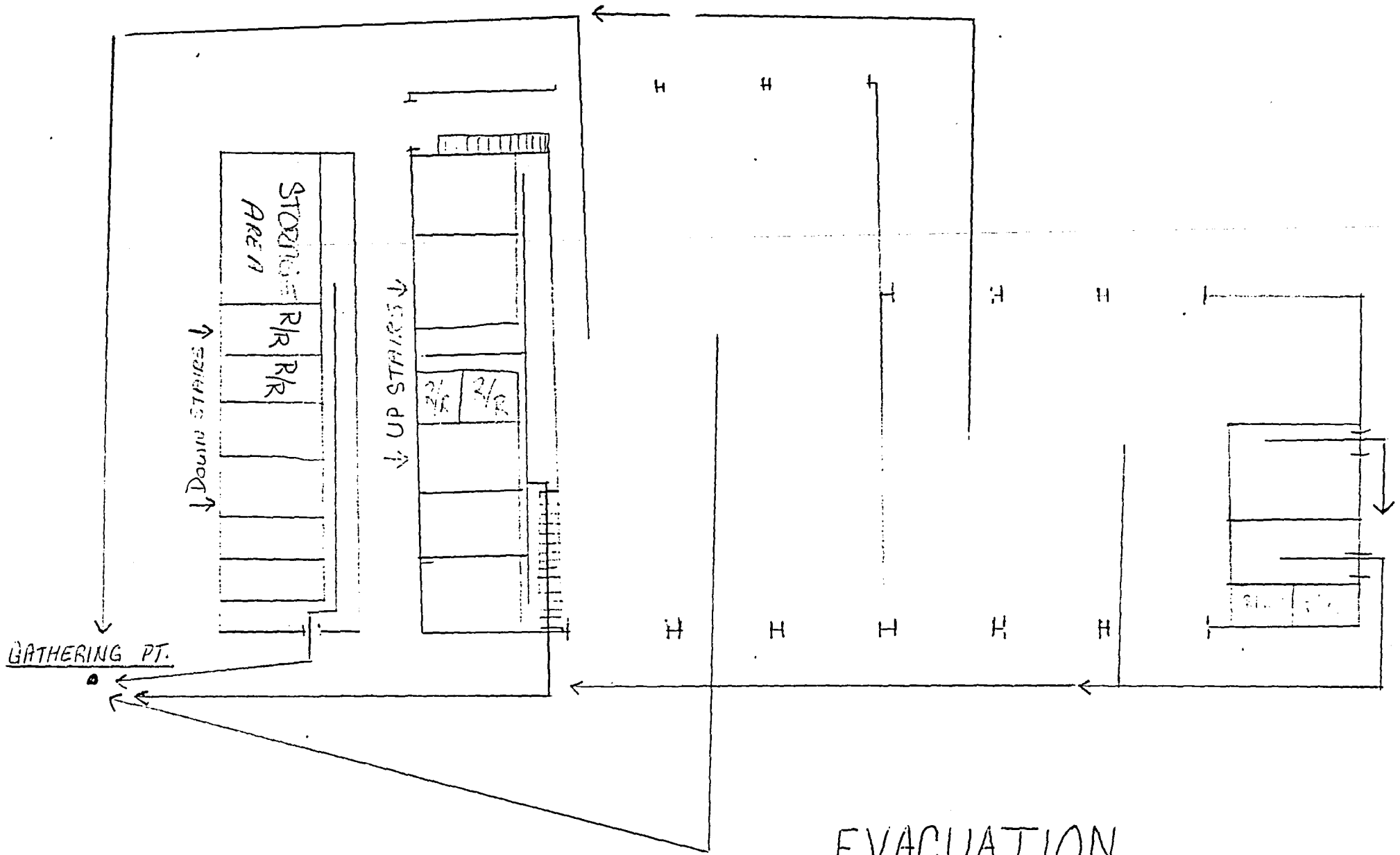
The command post should be removed from any hazard and have internal and external communications systems. For example, dispatch office - CP.

5. *Designated Spokespersons*

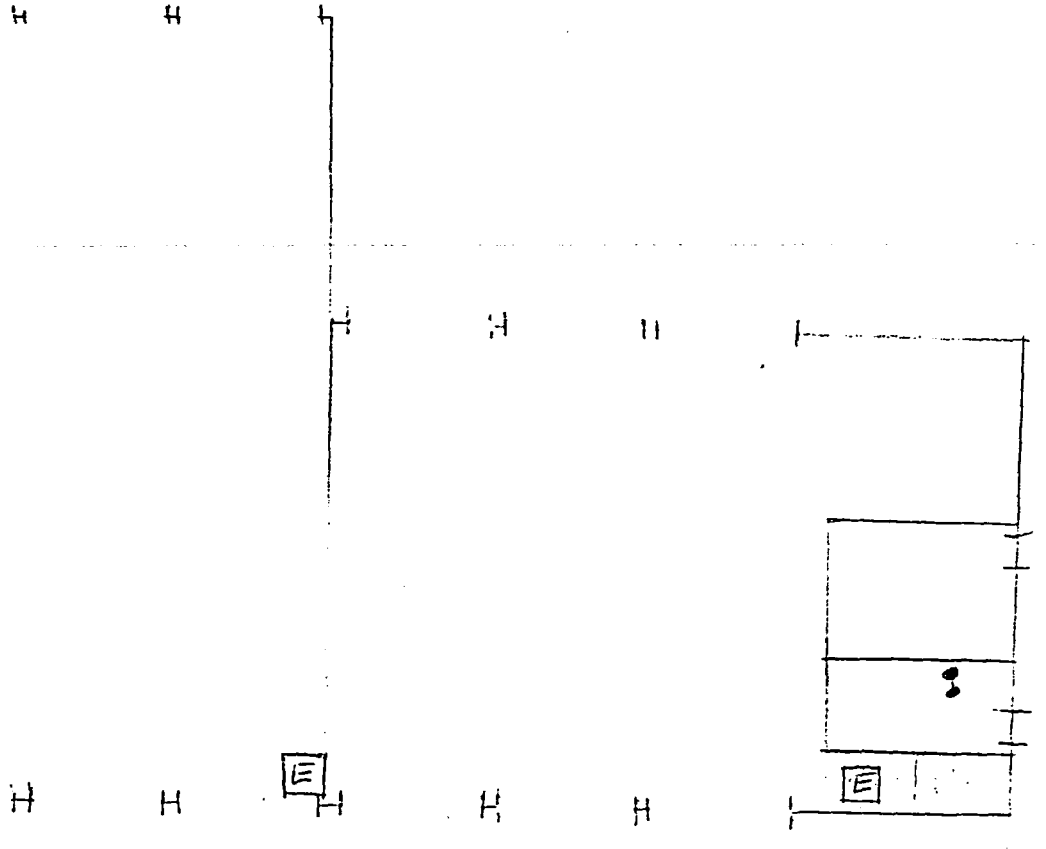
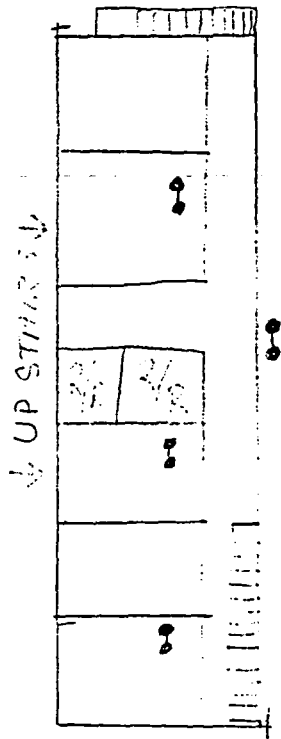
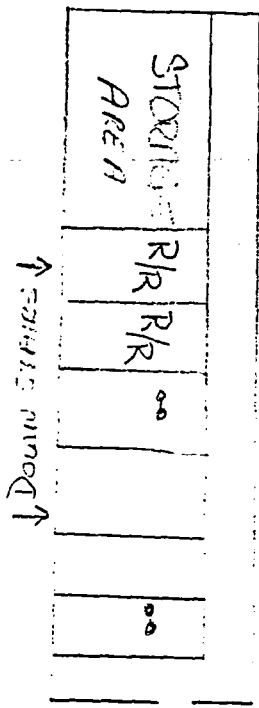
Mr. Ronald Dana, Mr. Daniel Bonanni, Director of Environmental Affairs and the facility manager, are designated as spokespersons to address public relations for the incident. All individuals **must** refer queries to the aforesaid individuals.

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.



EVACUATION
PLAN



E ELECTRICAL

i 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.
- c. Assess all hazards to human health or environment.
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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

Jan 1996

HAZARDOUS COMPONENTS

	<u>%</u>	
Sodium Hydroxide CAS 1310-73-2	>70	PEL=2 mg/m3
Silicic acid, disodium salt CAS 6834-92-0	<20	PEL= 2 mg/m3 as TWA

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

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

TRADE NAME OF PRODUCT KETTLE CLEANER

PAGE 4

=====

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 EFFECTIVE DATE: 8/92
GENERIC NAME: ANHYDROUS SODIUM HYDROXIDE PHONE #: 800-925-8958
SUPPLIERS NAME: CHEMICAL SERVICE & SUPPLY
SUPPLIERS ADDRESS: 2920 RT. 35 EAST WINFIELD, WV 25213
PROPER SHIPPING NAME: SODIUM HYDROXIDE, SOLID

HMIS	
HEALTH	3
FIRE	0
REACTIVITY	1

CHEMICAL FAMILY: ALKALI

SECTION 2 INGREDIENTS

CHEMICAL NAME	CAS#	WT.%	PEL	TWA-TLV	CAR.
SODIUM HYDROXIDE	1310-73-2	0-75	2mg/M3	C2mg/M3	NO
SODIUM METASILICATE	6834-92-0	0-10			NO
SODIUM CARBONATE	497-19-8	0-15			NO

SECTION 3 PHYSICAL DATA

BOILING RANGE: N/A SPECIFIC GRAVITY: 2.1
VAPOR PRESSURE: N/A VAPOR DENSITY: N/A
% VOLATILE: N/A MELTING POINT: DECOMPOSES 131 F
SOLUBILITY IN WATER: COMPLETE EVAPORATION RATES: N/A
PHYSICAL DESCRIPTION: WHITE GRANULAR POWDER, NO ODOR

SECTION 4 FIRE AND EXPLOSION HAZARD

FLASH POINT: N/A METHOD USED: NONE
FLAMMABLE LIMITS: N/A
EXTINGUISHING MEDIA: N/A
SPECIAL FIRE FIGHTING PROCEDURES: 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 HYDROGEN GAS. REACTION WITH VARIOUS FOOD SUGARS MAY FORM CARBON MONOXIDE.

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 MEDICAL 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 IMMEDIATE 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 LOCAL 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

=====

<u>MIXTURES OF LIQUIDS, SOLIDS & GASES</u>	<u>%</u>	<u>TLV UNITS</u>
2-BUTOXYETHANOL CAS 111-76-2	<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

FLAMMABLE 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.

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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 stomach.

MATERIAL SAFETY DATA SHEET: HIBRETT PURATEX, PENNSAUKEN, NJ

TRADE NAME OF PRODUCT PANTHER

PAGE 2

EMERGENCY AND FIRST AID PROCEDURE: EXTERNAL: EYES: immediately flush eyes with large amount of water for at least 15 minutes, hold lids apart to insure flushing of entire eye. If irritation persists seek medical aid. SKIN: Immediately wash contaminated area with water for 15 minutes. Remove contaminated clothing and shoes. Wash clothing before re-use, Discard shoes. If irritation persists seek medical aid. INHALATION: Move to fresh air. If breathing has stopped, resuscitate and administer oxygen if available. Seek medical attention immediately. INGESTION: Never give anything by mouth to an unconscious person. If swallowed induce vomiting by giving 2 tablespoons syrup of ipecac. if unavailable give 2 glasses of water and induce vomiting by touching finger to back of victims throat. Keep victims head below hips while vomiting. keep airway clear. Seek medical attention immediately.

REACTIVITY DATA

STABILITY ==== This product is stable

CONDITIONS TO AVOID: Do not mix with any other cleaning products or acids.

INCOMPATIBILITY (materials to avoid): Do not mix with acids or any other cleaning chemicals.

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide and unidentified organic compounds may be released during combustion.

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR:

CONDITIONS TO AVOID: none

SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Use a suitable absorbent to pick up spilled material. Shovel 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.

WASTE DISPOSAL METHOD: Dispose of in accordance with all local, state and federal regulations.

TRADE NAME OF PRODUCT: PANTHER

PAGE 3

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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

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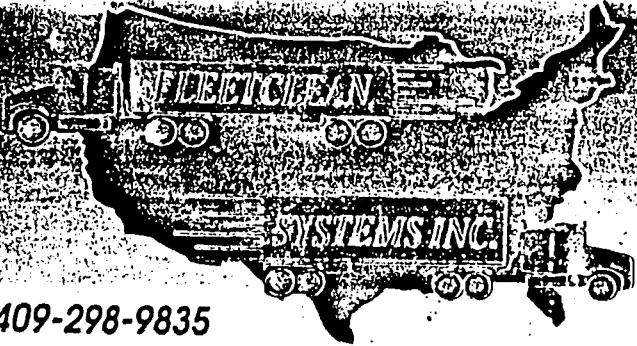
SPECIAL PRECAUTIONS

PRECAUTIONS 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 vendee's 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 1 Box 289 Liberty, Texas 77575

409-298-9835

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 NAME AND ADDRESS	FLEETCLEAN SYSTEMS INC ROUTE 1 BOX 289 LIBERTY, TEXAS 77575	TELEPHONE (409) 298-9835
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CHEMICAL CLASS: INORGANIC ACID CLEANING COMPOUND CAS NUMBER: NONE FOR 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.

MSDS NUMBER: 1B00101
MSDS DATE: 1/1/96
PRODUCT NAME: 1B CONCENTRATE

PAGE 2 OF 4

III. HEALTH HAZARD INFORMATION

EMERGENCY AND FIRST AID PROCEDURES

SKIN: FLUSH GENTLY WITH COOL WATER AND UNDER NAILS FOR A MINIMUM FOR 15 MINUTES. IMMERSE IN SOLUTION OF 0.13% ICE AQUEOUS ZEPHIRAN CHLORIDE. IF IMMERSION IS NOT PRACTICAL, APPLY COMPRESSES SOAKED IN ZEPHIRAN CHLORIDE. CALL PHYSICIAN 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 INDUCE 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.

MSDS NUMBER: 1B00101
MSDS DATE: 1/1/96
PRODUCT NAME: 1B CONCENTRATE

PAGE 3 OF 4

IV. FIRE AND EXPLOSION DATA

FLASH POINT: NON FLAMABLE AUTOIGNITION TEMPERATURE: NA

FLAMABLE LIMITS IN AIR, % BY VOLUME UPPER: NA
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.

MSDS NUMBER: 1B00101
MSDS DATE: 1/1/96
PRODUCT NAME: 1B CONCENTRATE

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VIII. HANDLING AND STORAGE

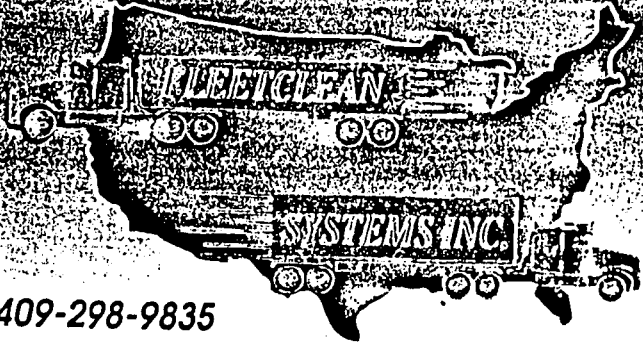
DO NOT GET IN EYES, ON SKIN AND ON CLOTHING. DO NOT TAKE INTERNALLY. USE WITH ADEQUATE VENTILATION. WHEN EXPOSED TO CONCENTRATED VAPORS IN A CONFINED AREA, USE OF RESPIRATORY PROTECTION MAY BE NECESSARY. WHEN HANDLING, WEAR CHEMICAL SPLASH GOGGLES AND RUBBER GLOVES. WASH THOROUGHLY AFTER HANDLING, AS 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.

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 THOROUGHLY 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 OUT OF STORM SEWER OR SANITARY SEWER.

WASTE DISPOSAL METHOD: TREAT TO DISPOSE OF ACCORDING TO REGULATIONS UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT AS ADMINISTERED BY THE USEPA OR APPROPRIATE STATE AGENCY.



Route 1 Box 289 Liberty, Texas 77575

409-298-9835

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 NAME AND ADDRESS	FLEETCLEAN SYSTEMS INC ROUTE 1 BOX 289 LIBERTY, TEXAS 77575	TELEPHONE (409) 298-9835
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CHEMICAL CLASS: INORGANIC ALKALINE CLEANING COMPOUND, LIQUID CAS NUMBER: NONE FOR 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. TLV: 2 mg/m3	1310-73-2	2-5
TRISODIUM NITRILOTRIACETATE			2-4

CAS = CHEMICAL ABSTRACT SERVICE NUMBER

PEL = OSHA PERMISSIBLE EXPOSURE LIMIT

TLV = ACGIH THRESHOLD LIMIT VALUE CURRENT

NC = NO RELEVANT INFORMATION OR NOT AVAILABLE

NA = NOT APPLICABLE

CEL = CORPORATE EXPOSURE LIMIT

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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.

EFFECTS OF OVEREXPOSURE

THE MATERIALS IN THIS PRODUCT ARE NOT LISTED IN THE TSCA INVENTORY AS CARCINOGENIC BY IARC, NTP, OSHA, ACGIH.

MSDS NUMBER: 2B00102
MSDS DATE: 1/1/96
PRODUCT NAME: 2B CONCENTRATE

PAGE 3 OF 4

IV. FIRE AND EXPLOSION DATA

FLASH POINT: NON FLAMABLE AUTOIGNITION TEMPERATURE: NA

FLAMABLE LIMITS IN AIR, % BY VOLUME UPPER: NA
LOWER: 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.

MSDS NUMBER: 2B00102
MSDS DATE: 1/1/96
PRODUCT NAME: 2B CONCENTRATE

PAGE 4 OF 4

VIII. HANDLING AND STORAGE

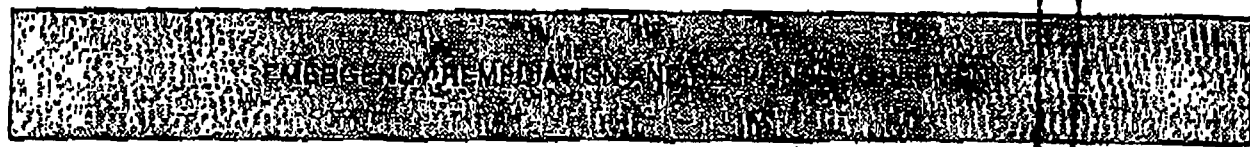
DO NOT GET IN EYES, ON SKIN AND ON CLOTHING. DO NOT TAKE INTERNALLY. USE WITH ADEQUATE VENTILATION. WHEN EXPOSED TO CONCENTRATED VAPORS IN A CONFINED AREA, USE OF RESPIRATORY PROTECTION MAY BE NECESSARY. WHEN HANDLING, WEAR CHEMICAL SPLASH GOGGLES AND RUBBER GLOVES. WASH THOROUGHLY AFTER HANDLING, AS EXPOSURE CAN CAUSE BURNS WHICH ARE NOT IMMEDIATELY PAINFUL OR VISIBLE. KEEP CONTAINERS TIGHTLY CLOSED. STORE IN COOL DRY LOCATION AWAY FROM INCOMPATIBLE MATERIALS.

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 THOROUGHLY 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 ADMINISTERED BY THE USEPA OR APPROPRIATE STATE AGENCY.



THIS EMERGENCY REMEDIATION AND RESPONSE AGREEMENT (the "Agreement") is made this 30 day of Dec, 1994 by and between DANA CONTAINER a corporation with its principal office located in AVONEL, N.C. (the "Customer") and FOUR SEASONS ENVIRONMENTAL, INC., A Corporation with its principal place of business located in Greensboro, 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 emergencies of the customer to provide special control and cleanup services on the terms and conditions described herein below.

NOW THEREFORE, the parties hereto do hereby agree as follows:

RESPONSE BY FOUR SEASONS. Upon notification of an authorized agent of the Customer, Four Seasons shall respond to petroleum, chemical 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 regarding any time period by which a response will be made.

AGREEMENT BY THE CUSTOMER. The Customer agrees to execute the standard Four Seasons waste service agreement (the "Waste Service Agreement"), a copy is attached hereto as Exhibit A within (24) hours after notifying Four Seasons of an emergency. Authorized personnel of Four Seasons 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:

Charly Ferrell III

FOUR SEASONS ENVIRONMENTAL, INC.:

Jes. H. Hester

Spectrum Environmental



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

EQUIPMENT

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
Back Hoe:	Case 580 Super E
Dump Truck:	8 Cubic Yards
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 have had 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	704-346-6890
additional pager number	704-346-3636

SPILL PRICE STRUCTURE:

Spill truck with crew \$150/hr portal to portal (after 6:00 pm \$200/hr)
Pumper Truck with driver \$125/hr portal to portal

Disposal of liquids (oil,diesel,gasoline) \$0.50/gal

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

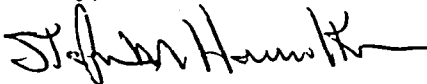
TPH \$125 ea
oil/grease \$100 ea
PID meter \$75/ day

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 EMERGENCY 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:

A.

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 of 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 is divided into subheadings: fire, explosion, health hazards, small or large spills and first aid.
- d. Blue: Contains an alphabetical version of hazardous materials listed in the yellow pages.
- e. Green: 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 control 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.

A handwritten signature in cursive script, appearing to read "Ronald Dana".

RONALD DANA
President

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: _____

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

30% Post Consumer ♻

 **COOPER ENVIRONMENTAL**
ENGINEERS • GEOLOGISTS • SCIENTISTS

Steward W. Scher
Director of Business Development

2300 SARDIS ROAD N. • SUITE Q • CHARLOTTE, NC 28227
PHONE (704) 845-2000 • FAX (704) 841-8901

A
Environmental and
&
Industrial Services, Inc.
D

STATEMENT OF QUALIFICATIONS

Mailing Address:

Post Office Box 484
High Point, NC 27261

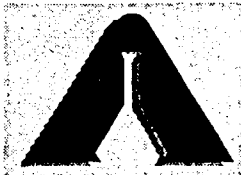
Facility Address:

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.

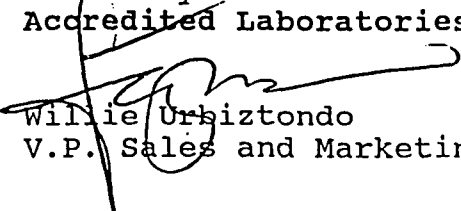
As per our discussion, this is to confirm extension of Accredited Laboratories, Inc.'s. field sampling and analytical services agreement with Dana Transport effective November 1, 1996 until officially informed of its term status by your office.

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

CORPORATE OFFICES:
Foot of Pershing Avenue

800-254-LABS
P.O. Box 369

908-541-2025
Carteret, New Jersey

FAX 908-541-1383
07008-0369

ACCREDITED LABORATORIES, INC.

MAJOR ANALYTICAL PACKAGES

For: DANA TRANSPORT

Effective: 11/15/96

Prepared by: Willie Urbiztondo

FEE SCHEDULE

TESTING PARAMETERS	Water/Soil-Reduced Deliverables				
	10 DAYS	5 DAYS	72 HRS	48 HRS	24 HRS
MAJOR ANALYTICAL					
priority Pollutant	\$525	\$656	\$708	\$919	
PP+40	\$579	\$724	\$782	\$1013	
TCL/TAL	\$600	\$750	\$810	\$1050	
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	
pH	\$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.			
	10 day	5 days	72hrs	48 hrs
Waste Characterization				
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

Testing Parameter	Methods	Standard Deliverables			
		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					
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					
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					
Ammonia	350.2	\$12	\$15	\$18	\$24
Total Kjeldahl	.351.3	\$12	\$15	\$18	\$24
Nitrate	SM 4500/352.1	\$12	\$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

Testing Parameter	Methods	Reduced Deliverables			
		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
Phenols, 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
Silica, 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

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)
(Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Hg, Ni, K, Se, Ag, Na, Ti, V, Zn)

Testing Parameter	Standard Methods	Optional Methods	Fee Schedule (1)				
			10 DAYS		5 DAYS	48 HRS	24 HRS
			Standard Methods	Optional Methods			
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	220.1/7210	\$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	\$16	\$8	\$20	\$24	\$40
Lithium (Li)	SM 3500	7430	\$8	\$16	\$10	\$12	\$20
Magnesium (Mg)	200.7/6010	242.1/7450	\$8	\$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	\$8	\$16	\$10	\$12	\$20
Platinum (Pt)	200.7/6010	255.1	\$8	\$16	\$10	\$12	\$20
Potassium (K)	200.7/7740	258.1/7610	\$8	\$16	\$10	\$12	\$20
Selenium (Se)	200.7/6010		\$16		\$20	\$24	\$40
Silicon (Si)	200.7/6010		\$8		\$10	\$12	\$20
Silver (Ag)	200.7/6010	272.1/7760	\$16		\$20	\$24	\$40
Sodium (Na)	200.7/6010	273.1/7770	\$8	\$16	\$10	\$12	\$20
Strontium (Sr)	200.7/6010	7780	\$8	\$16	\$10	\$12	\$20
Thallium (Tl)	279.2/7841	200.7/6010	\$16	\$8	\$20	\$24	\$40
Tin (Sn)	200.7/6010	282.1/7870	\$8	\$16	\$10	\$12	\$20
Titanium (Ti)	200.7	283.1	\$8	\$16	\$10	\$12	\$20
Vanadium (V)	200.7/6010	286.1/7910	\$8	\$16	\$10	\$12	\$20
Zinc (Zn)	200.7/6010	289.1/7950	\$8	\$16	\$10	\$12	\$20

MICROBIOLOGICAL ANALYSIS

Testing Parameter	Method	Fee Schedule			
		5 DAYS		10 DAYS	
		Water	Soil	Water	Soil
MICROBIOLOGY					
Bioassay (Microtox TM)	N/A	\$18	\$18	\$14	\$14
Coliform, Fecal (MF/MPN)	SM 9222D	\$18	\$18	\$14	\$14
Coliform, Total (MPN)	SM 9221 B	\$30	\$50	\$24	\$40
E. Coli	SM 9225	\$25	\$50	\$20	\$40
Enterococcus(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	



Full Service Analytical & Environmental Solutions

CHAIN OF CUSTODY RECORD

PAGE 1 OF 1 QUOTE # _____
449 Springbrook Road ▲ Charlotte, NC 28217
P.O. Box 240543 ▲ Charlotte, NC 28224-0543
Phone: 704/529-6364 ▲ Fax: 704/525-0409

LAB USE ONLY

Samples TRACE Amount?
 Samples on Ice (or Dry Ice) 30
 Samples Properly Sealed?
 Samples Properly Labeled?
 Labels with Lot # & No. Space?
 Proper Containers Used?

PRESS DOWN FIRMLY - 3 COPIES

Client: Must Bros. IBC
 Physical Address: 7300 Hill - Hillside Rd.
Charlotte, NC
 Phone: 771-3335 Fax: _____
 P.O./Billing Reference: _____
 Project Name: _____

REPORT TO: Name: Bill Miller
 Address: 1730 Tasker Rd.
 BILL TO: Name: _____
 Address: _____
 Requested Due Date: _____

State Certification
 Requested: NC SC _____ Other NA
 Water Chlorinated: Yes _____ No NA
 Sample Iced Upon Collection: Yes No _____

(SEE REVERSE SIDE FOR RUSH TURNAROUND FEES)

CLIENT SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED MILITARY HOURS	MATRIX (SOIL, WATER OR SLUDGE)	SAMPLE CONTAINER			PRESERVATIVES	ANALYSES REQUESTED	REMARKS	SUB LAB CERC ID NO.	PRESM LAB ID NO.
				TYPE SEE BELOW	NO.	SIZE					
<u>HSI Residual Waste</u>	<u>6/22/99</u>	<u>1000</u>	<u>Soil</u>	<u>G</u>	<u>3</u>	<u>70ml</u>	—	<u>✓</u>			<u>3337</u>

Sampler's Signature: [Signature] Sampled By (Print Name): JAMES S. KUMMER Affiliation: GIS

Relinquished By: (Signature) <u>[Signature]</u>	Received By: (Signature) <u>[Signature]</u>	Date	Military Hours	Additional Comments <u>* See Susan Miller for analysis</u>
Relinquished By: (Signature) _____	Received By: (Signature) _____	Date		
Relinquished By: (Signature) _____	Relinquished For Primary Laboratories By: <u>[Signature]</u>	Date: <u>6/22/99 1000</u>	Log-In Group No.: <u>501521</u>	
Method of Shipment: _____				

NPDES: NC _____ UST: NC _____ GROUNDWATER: NC _____ DRINKING WATER: NC _____ SOLID WASTE: NC _____ OTHER: NC
 SC _____ SC _____ SC _____ SC _____ SC _____ SC _____ SC _____ SC _____
 OTHER: _____ OTHER: _____ OTHER: _____ OTHER: _____ OTHER: _____ OTHER: _____ OTHER: _____

*CONTAINER TYPE CODES: A = Amber C = Clear G = Glass P = Plastic TL = Teflon-Lined Cap VOA = Volatile Organics Analysis (Zero Head Space)

FROM 9197153685 SOLID WASTE DTU 11.01.1999 15122



Corporate Waste
Approval Group
Brownings-Ford's Industries

WASTE APPROVAL FORM

Date	:	07-22-99
BFI Location	:	Charlotte Landfill
BFI Initiator	:	Linda Daniel
Generator	:	Mast Brothers
Generator Location	:	Charlotte, NC
WCD Number	:	NP30773
BFI Number	:	000201BR

WASTE DESCRIPTION:

Contaminated Soil

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact,

RECOMMENDED MANAGEMENT:

Bioremediation

Facility...

Charlotte Landfill

COMMENTS:

The following items were reviewed by the Corporate Waste Approval Group:

- 1- WCD dated 07/21/99
- 2- Analysis from Prism Laboratories

The above is a recommendation of BFI. 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 permit and applicable federal, state, and local regulations. The waste is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that 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



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

0-000-64 NI

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D 0 4 8 4 5 1 3 7 0		MANIFEST DOCUMENT NO. 6 2 1 0 2	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.
3. Generator's Name and Mailing Address DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28214					A. State Manifest Document Number	
4. Generator's Phone 800 796-3292					B. State Generator's ID	
5. Transporter 1 Company Name T.B. MONT SPECIFIC PRODUCTS			6. US EPA ID Number 1 8 0 9 8 1 7 0 5 5 1		C. State Transporter's ID	
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone 1-800-368-8539	
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073			10. US EPA ID Number S C D 0 7 7 9 9 5 4 8 8		E. State Transporter's ID	
					F. Transporter's Phone	
					G. State Facility's ID	
					H. Facility's Phone 803 356-4061	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					12. Containers No.	13. Total Quantity
a. RO WASTE COMBUSTIBLE LIQUID, H.O.S. (ETHANOL) NA1993 PG III (DO08)(ERG#27)					202	920
b.						Unit Wt/Vol
c.						Waste No. D 0 0 8
d.						
J. Additional Descriptions for Materials Listed Above.					K. Handling codes for wastes Listed Above	
a. SK 110156 002H					c.	
b.					d.	
15. Special Handling Instructions and Additional Information EMERGENCY RESP# (800)466-1760 IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. SFDOT# A: 8851 B: C: D:						
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 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.						Date
Printed/Typed Name Robert F Hayes				Signature Robert F Hayes		Month Day Year 8/24/95
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature		Date
Printed/Typed Name Robert F Hayes				Signature Robert F Hayes		Month Day Year 8/24/95
18. Transporter 2 Acknowledgement or Receipt of Materials				Signature		Date
Printed/Typed Name				Signature		Month Day Year
19. Discrepancy Indication Space						
a.			b.		c.	
lbs.			lbs.		lbs.	
b.			c.		d.	
lbs.			lbs.		lbs.	
20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Duke D. Cannon				Signature Duke D. Cannon		Month Day Year 10/24/95

GENERATOR

TRANSPORTER

FACILITY



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.
2800 Bull Street, Columbia, SC 29201
Phone: (803) 734-5200
Emergency & Holidays: (803) 253-6488

0-000-54 NL

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NC D 0 4 8 4 6 1 7 0		MANIFEST DOCUMENT NO. 6 2 1 0 3		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is by State law.					
3. Generator's Name and Mailing Address DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28214						A. State Manifest Document Number							
4. Generator's Phone (800) 796-3262						B. State Generator's ID							
5. Transporter 1 Company Name J B HUNT SPECIAL COMMODITIES				6. US EPA ID Number 4 2 2 0 9 1 7 0 8 5 5 1		C. State Transporter's ID							
7. Transporter 2 Company Name						D. Transporter's Phone 1-800-368-8557							
8. US EPA ID Number						E. State Transporter's ID							
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073						G. State Facility's ID							
10. US EPA ID Number S C D 0 7 7 9 8 5 4 0 8						H. Facility's Phone 803 356-4061							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. RO WASTE FLAMMABLE LIQUIDS, N.O.S. (ALPHA-METHYLSTYRENE) 3 UN1993 PG III (DOO) (ERG#27)						002 DM		720 25		G P		D 0 0 1	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above.						K. Handling codes for wastes Listed Above							
a. BK / POISS / OPP /						c.							
b.						d.							
15. Special Handling Instructions and Additional Information EMERGENCY RESP# (800) 468-1760 IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. SKDOT# A: 2648 B: C: D:						91991507 0-000-64-1606							
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 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.						Printed/Typed Name Robert F. Hoover		Signature Robert F. Hoover		Date 01/21/96			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Dwight L. ...		Signature Dwight L. ...		Date 01/21/96			
18. Transporter 2 Acknowledgement or Receipt of Materials						Printed/Typed Name		Signature		Date			
19. Discrepancy Indication Space						a. lbs. c. lbs.		b. lbs. d. lbs.					
20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Printed/Typed Name Billy D. ...		Signature Billy D. ...		Date 06/24/96			

81363-R4784
ENVIRØSYSTEMS
DANA CONTAINER

PREQUALIFICATION EVALUATION
MANIFEST INFORMATION

REVISED: 06/19/96
RUN: 06/20/96

CONTROL #: 1610876-9
SAMPLE #: 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.

UNIFORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO. NCD048461370	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>
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3. GENERATOR NAME AND MAILING ADDRESS DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28214		A. STATE MANIFEST DOCUMENT NO
4. GENERATOR PHONE 800 796 3262		B. STATE GENERATOR ID

5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID D. TRANSPORTER PHONE
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7. TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID F. TRANSPORTER PHONE
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9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073	10. US EPA ID NUMBER SCD077995488	G. FACILITY STATE ID H. FACILITY PHONE 803 356 4061
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11. US DOT DESCRIPTION A. HM. RQ WASTE FLAMMABLE LIQUIDS, N.O.S. (ETHANOL) 3 UN1993 PG II (D001)(ERG#27)	CONTAINER	I. WASTE NO D001 N/H
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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.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

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: D001

TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE CODE	WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY OR 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 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: 1048617

CONTROL NUMBER: 1610876-9



South Carolina Department of Health and Environmental Control

0-000-64 NL

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 designed for use on elite (12-pitch) typewriter.)

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D O 4 8 4 5 1 3 7 0		MANIFEST DOCUMENT NO. 6 2 1 0 4	2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address DANA CONTAINER 7254 MT HOLY RD. CHARLOTTE NC 28214					A. State Manifest Document Number		B. State Generator's ID	
4. Generator's Phone (800) 796-3262					C. State Transporter's ID		D. Transporter's Phone (803) 368-8339	
5. Transporter 1 Company Name T.B. HUNT SPECIAL COMMUNITIES					6. US EPA ID Number K 0 7 8 1 9 0 1 5 5 1		E. State Transporter's ID	
7. Transporter 2 Company Name					8. US EPA ID Number		F. Transporter's Phone	
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073					10. US EPA ID Number S C D O 7 7 9 9 5 4 8 8		G. State Facility's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. NO WASTE FLAMMABLE LIQUIDS, N.O.S. (ETHANOL) 3 UN1993 PG II (D001)(ERG#27)					12. Containers No. Type 303 DM		13. Total Quantity 1375	
					14. Unit WU/Vol P		I. Waste No. D 0 0 1	
J. Additional Descriptions for Materials Listed Above.					K. Handling codes for wastes Listed Above			
15. Special Handling Instructions and Additional Information EMERGENCY RESP# (800)468-1760 IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. SKDOT# A: 2015 B: C: D:					REF# 91991604 0-000-64-1606			
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 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.					Printed/Typed Name Robert F. H... Signature Robert F. H... Date 11/24/96			
17. Transporter 1 Acknowledgement of Receipt of Materials					Printed/Typed Name DANA D. M... Signature Dana D. M... Date 11/24/96			
18. Transporter 2 Acknowledgement or Receipt of Materials					Printed/Typed Name Signature Date			
19. Discrepancy Indication Space					a. lbs. c. lbs.		b. lbs. d. lbs.	
20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					Printed/Typed Name Signature Date			

GENERATOR
TRANSPORTER
FACILITY

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	1. GENERATORS US EPA NO. NCD048461370	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>
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3. GENERATOR NAME AND MAILING ADDRESS DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28214	4. GENERATOR PHONE 800 796 3262	A. STATE MANIFEST DOCUMENT NO	B. STATE GENERATOR ID
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5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID	D. TRANSPORTER PHONE
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7. TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID	F. TRANSPORTER PHONE
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9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073	10. US EPA ID NUMBER SCD077995488	G. FACILITY STATE ID	H. FACILITY PHONE 803 356 4061
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11. US DOT DESCRIPTION A. HM. RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (ETHANOL) NA1993 PG III (D008)(ERG#27)	CONTAINER	I. WASTE NO D008 N/H
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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.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

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

TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE CODE	WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY OR REGULATED HAZARDOUS CONSTITUENT	TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE
D008	LEAD (PB)	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

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	1. GENERATORS US EPA NO. NCD048461370	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>
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3. GENERATOR NAME AND MAILING ADDRESS DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28214	A. STATE MANIFEST DOCUMENT NO
4. GENERATOR PHONE 800 796 3262	B. STATE GENERATOR ID

5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID	D. TRANSPORTER PHONE
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7. TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID	F. TRANSPORTER PHONE
--------------------------	-----------------	----------------	----------------------

9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073	10. US EPA ID NUMBER SCD077995488	G. FACILITY STATE ID	H. FACILITY PHONE 803 356 4061
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11. US DOT DESCRIPTION A. HM. RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (ETHANOL) NA1993 PG III (D008)(ERG#27)	CONTAINER	I. WASTE NO 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.



South Carolina Department of Health and Environmental Control

0-000-64 NL

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 designed for use on elite (12-pitch) typewriter.)

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D O 4 8 4 6 1 7 7 0		MANIFEST DOCUMENT NO. 62125	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.		
3. Generator's Name and Mailing Address DANA CONTAINER 7254 MT HOLY RD CHARLOTTE, NC 28214					A. State Manifest Document Number			
4. Generator's Phone (800) 736-3262					B. State Generator's ID			
5. Transporter 1 Company Name J.B. HUNT SPECIAL COMMODITIES		6. US EPA ID Number 4 R 0 0 2 1 9 0 8 5 5 1		C. State Transporter's ID			D. Transporter's Phone 1 8 0 0 7 6 8 2 5 3 9	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID			F. Transporter's Phone	
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073		10. US EPA ID Number S C D O 7 7 9 9 5 4 6 8		G. State Facility's ID			H. Facility's Phone 8 0 3 3 5 6 - 4 0 6 1	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. PO WASTE FLAMMABLE LIQUIDS, H.O.S. (TOLUENE&ISOPROPYL ACETATE) 3 UN1993 PG II(F005)(ERG#27)					12. Containers No. Type 003 DM	13. Total Quantity 1375 2496	14. Unit Wt/Vol P	1. Waste No. F 0 0 5 D 0 0 1
J. Additional Descriptions for Materials Listed Above					K. Handling codes for wastes Listed Above			
a. SK 1101061 01024					b.			
15. Special Handling Instructions and Additional Information EMERGENCY RESP# (800)468-1760 IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.					11-57 REV# 91991612 0-000-64-1606			
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 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.					EMDOT# A: 2062 B: C: D:			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: Robert F. Hawes Signature: Robert F. Hawes Date: 05/24/96					18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: DONALD L. MULLER Signature: Donald L. Muller Date: 06/24/96			
19. Discrepancy Indication Space					a. lbs. c. lbs. b. lbs. d. lbs.			
20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name: Billy D. ... Signature: Billy D. ... Date: 06/24/96								

DANA CONTAINER (CHARLOTTE, N.C.)

HAZ DRUMS

- ? 1) PHENOL - DIRT ① 1
- 2) DIESEL FUEL OIL 2
- ✓ 3) WHITE INK 3
- 4) WASTE WATER 4
- 5) EMOCIC ACID 5
- ? 6) DIESEL FUEL - SODIUM BISULFITE ② 2
- ✓ 7) RED INK - ACETONE ③ 3
- 8) PHENOL - DIRT 1
- 9) WASTE WATER ④ 4
- 10) WASTE WATER ④ 4
- ? 11) PHENOL ④ 1
- ? 12) PHENOL ④ 1
- ✓ 13) INK 3
- ✓ 14) ETHER ⑥ 6
(CAS 60297 15%)

NON-HAZ

Hint
Cider

- 1) LATEX - FATTY ACID 1
- 2) TEA - GLYCOL 2
- 3) FATTY ALCOHOL 3
- (4) LIROL PS 6096 4
- (5) LIROL PS 6096 4
- (6) LIROL PS 6046 4
- (7) LIROL P 5604 4
- 8) LIROL QST 4
- 9) WAX EMULSION 5
- 10) LATEX ⑥ 1
- 11) LIROL 48M 4
- 12) LIROL PS 6096 4
- 13) LIROL 48M 4
- 14) LATEX ⑥ 1
- 15) LATEX ⑥ 1
- 16) LATEX ⑥ 1
- 17) TAR ⑥ 6
- 18) LATEX - FATTY ACID 1
- 19) WAX EMULSION 5
- 20) WAX EMULSION 5
- 21) SOAP STOCK ⑧ 7
- 22) LATEX ⑥ 1
- 23) LIROL #226 4
P00700, P555414, PP933,
- 24) PP3728, POS20 4
LURGEN 48M, LIROL-RO109,
- 25) R3006, R0624 4
- 26) P00700, PS 6048, LIROL 64894 4
4511

81363-R4784
ENVIROSYSTEMS
DANA CONTAINER

PREQUALIFICATION EVALUATION
MANIFEST INFORMATION

REVISED: 06/20/96
RUN: 06/21/96

CONTROL #: 1610870-6
SAMPLE #: 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.

UNIFORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO. NCD048461370	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>
3. GENERATOR NAME AND MAILING ADDRESS DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28214		A. STATE MANIFEST DOCUMENT NO B. STATE GENERATOR ID		
4. GENERATOR PHONE 800 796 3262	5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.		6. US EPA ID NO ILD984908202	C. ST TRANS ID D. TRANSPORTER PHONE
7. TRANSPORTER 2 CO NAME	8. US EPA ID NO		E. ST TRANS ID F. TRANSPORTER PHONE	
9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073		10. US EPA ID NUMBER SCD077995488	G. FACILITY STATE ID H. FACILITY PHONE 803 356 4061	
11. US DOT DESCRIPTION A. HM. RQ WASTE FLAMMABLE LIQUIDS, N.O.S. (ALPHA-METHYLSTYRENE) 3 UN1993 PG III (D001)(ERG#27)			CONTAINER	I. WASTE NO D001 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.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

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: D001

TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE CODE	WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY OR 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 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: 1610870-6

11842227

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

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

U.S. EPA 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 Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NC0074505850	Manifest Document No. 91196		2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address Dana Container Corp. 7254 Mt. Holly Rd. Charlotte, NC 28214					A. State Manifest Document Number			
4. Generator's Phone (704) 776 399-3395					B. State Generator's ID			
5. Transporter 1 Company Name Haz Mat Environmental Group			6. US EPA ID Number NYD980769947		C. State Transporter's ID 11591P NY			
7. Transporter 2 Company Name Schneider National Bulk Carriers			8. US EPA ID Number W10981193998		D. Transporter's Phone 716-827-7200			
9. Designated Facility Name and Site Address Waste Technologies Industries 1250 Saint George St. East Liverpool, OH 43920					E. State Transporter's ID			
					F. Transporter's Phone 800-558-6623			
					G. State Facility's ID			
					H. Facility's Phone (216) 385-7336			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <input checked="" type="checkbox"/> RQ Hazardous Waste Solid, N.D.S. (Phenol)-9 NA 3077 PG III					4	DM	1105	P U188
b. <input checked="" type="checkbox"/> RQ Waste Corrosive Liquid, N.O.S. (Sodium Sulfide) 8 UN 1760 PG II					1	DM	525	P 0002 0003
c.								
d.								
J. Additional Descriptions for Materials Listed Above					K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information Emergency Response # (800) 468-1760 (24 Hr.); S-K Customer ID # 0000-61-1606 WTI Approval #s: 116) OCCN021 116) OCCN020					P2 101181L T04514			
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. 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.					Date			
Printed/Typed Name Robert F Hayes			Signature Robert F Hayes		Month Day Year 09 11 96			
17. Transporter 1 Acknowledgement of Receipt of Materials					Date			
Printed/Typed Name Don Davis			Signature Don Davis		Month Day Year 09 11 96			
18. Transporter 2 Acknowledgement of Receipt of Materials					Date			
Printed/Typed Name Robby Poby			Signature Robby Poby		Month Day Year 10 26 96			
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.								
Printed/Typed Name Steve Olesky			Signature Steve Olesky		Month Day Year 10 27 96			

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

90290

6

ORIGINAL-RETURN TO GENERATOR

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

81363-R4784
ENVIROSYSTEMS
DANA CONTAINER

PREQUALIFICATION EVALUATION
MANIFEST INFORMATION

REVISED: 06/20/96
RUN: 06/21/96

CONTROL #: 1610875-7
SAMPLE #: 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.

UNIFORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO. NCD048461370	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>	
3. GENERATOR NAME AND MAILING ADDRESS DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28214			A. STATE MANIFEST DOCUMENT NO B. STATE GENERATOR ID		
4. GENERATOR PHONE 800 796 3262	6. US EPA ID NO ILD984908202		C. ST TRANS ID D. TRANSPORTER PHONE		
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	8. US EPA ID NO		E. ST TRANS ID F. TRANSPORTER PHONE		
7. TRANSPORTER 2 CO NAME		10. US EPA ID NUMBER SCD077995488		G. FACILITY STATE ID H. FACILITY PHONE 803 356 4061	
9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073					
11. US DOT DESCRIPTION A. HM. RQ WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE&ISOPROPYL ACETATE) 3 UN1993 PG II(F005)(ERG#27)			CONTAINER	I. WASTE NO F005 N/H D001	
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.					

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: 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	33
TOLUENE **	10
TOLUENE ***	28

EPA WASTE CODE	WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY OR 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 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: 1048619 CONTROL NUMBER: 1610875-7



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

D-000-64 III

Form Approved OMB No. 2050-0039. Expires 9-30-

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

only deliveries

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. SC03850		MANIFEST DOCUMENT NO. 0812910		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address DANA CONTAINER 7254 MT HOLY RD CHARLOTTE NC 28214						A. State Manifest Document Number			
4. Generator's Phone 800-796-3262						B. State Generator's ID			
5. Transporter 1 Company Name J.O. Hunt Specialties		6. US EPA ID Number AL099190555		C. State Transporter's ID 506986 OK		D. Transporter's Phone 1-800-368-8533		E. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		F. Transporter's Phone		G. State Facility's ID			
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073				10. US EPA ID Number SC00077995409		H. Facility's Phone 803 356-4061			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity	
a. RG WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE/ISOPROPYL ACETATE) 3 UN1993 PG II (P005)(ER-427)						No. 101 Type DRUM		101/75	
b. RG WASTE FLAMMABLE LIQUIDS, N.O.S. (ALPHA-METHYLSTYRENE) 3 UN1993 PG III (D001)(ER-427)						No. 101 Type DRUM		101/100	
c. RG WASTE COMBUSTIBLE LIQUID, N.O.S. (ETHANOL) 3 UN1993 PG III (D001)(ER-427)						No. 101 Type DRUM		101/100	
d. RG Waste Flammable liquids, N.O.S. (Ethanol) 3 UN1993 PG II (D001)(ER-427)						No. 101 Type DRUM		101/1500	
15. Special Handling Instructions and Additional Information EMERGENCY RESP (800) 455-1740 IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETURN TO REUSE SUBSEQUENT CARRIERS AS NECESSARY.						K. Handling codes for wastes Listed Above			
a. SK 11010161100091 - SK 1100009100091									
b. SK 11010151100091 - SK 11010151100091									
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, m 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 Ca 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.						Date			
Printed/Typed Name Robert F. H...				Signature <i>Robert F. H...</i>		Month 08		Day 09	
17. Transporter 1 Acknowledgement of Receipt of Materials						Date			
Printed/Typed Name FRAUD RD D HALL				Signature <i>Fraud Rd D Hall</i>		Month 08		Day 09	
18. Transporter 2 Acknowledgement of Receipt of Materials						Date			
Printed/Typed Name				Signature		Month		Day	
19. Discrepancy Indication Space Spoke covered quantities in added weight for total weight seen.						a. <input type="text"/>		lbs. c. <input type="text"/>	
						b. <input type="text"/>		lbs. d. <input type="text"/>	
20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Date			
Printed/Typed Name Bill D. ...				Signature <i>Bill D. ...</i>		Month 08		Day 09	



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) 253-8488

-031-01

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D 0 7 4 5 0 5 8 5 0				MANIFEST DOCUMENT NO. 0 8 3 9 6		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is by State law.					
3. Generator's Name and Mailing Address DANA CONTAINER 7254 MT HOLLY RD CHARLOTTE NC 28214 Generator's Phone 704 399-3395								A. State Manifest Document Number							
5. Transporter 1 Company Name SAFETY-KLEEN CORP WORLDWIDE Environmental I L D 9 8 4 9 0 8 2 0 2								C. State Transporter's ID							
7. Transporter 2 Company Name								D. Transporter's Phone 704 399-0098							
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 130-A FRONTAGE ROAD LEXINGTON, SC 29073								H. Facility's Phone 803 356-4061							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)								12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. RO WASTE FLAMMABLE LIQUIDS, N.O.S. (ETHANOL) 3 UN1993 PG II (DO01)(ERG#128)								01017 DM		2131150		P		D 0 0 1	
b. RO WASTE FLAMMABLE LIQUIDS, N.O.S. (ALPHA-METHYLSTYRENE) 3 UN1993 PG III (DO01)(ERG#128)								01011 DM		2131450		P		D 0 0 1	
c. RO WASTE COMBUSTIBLE LIQUID, N.O.S. (ETHANOL) NA1993 PG III (DO01)(ERG#128)								01011 DM		2131450		P		D 0 0 8	
J. Additional Descriptions for Materials Listed Above								K. Handling codes for wastes Listed Above							
a. SK 10057 0024 SK 10056 0024															
b. SK 10055 0024															
15. Special Handling Instructions and Additional Information EMERGENCY RESP 800-450-1750 (24 HR) IF UNRECOVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. SDOT'S A: 2015 B: 3648 C: 3851 D:															
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 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.															
Printed/Typed Name Robert F Hayes						Signature Robert F Hayes			Date 11/10/96						
17. Transporter 1 Acknowledgement of Receipt of Materials															
Printed/Typed Name DON E. LEE						Signature Don E. Lee			Date 11/10/96						
18. Transporter 2 Acknowledgement or Receipt of Materials															
Printed/Typed Name						Signature			Date						
19. Discrepancy Indication Space ① TRANSPORTER changed by recipient 11/10/96															
20. FACILITY Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name Billy D. Carter						Signature Billy D. Carter			Date 11/10/96						



Generator Anna Container
 Waste Description Filter Press Resid
 Process Description Material From waste water Filter

64-1606
 SAFETY-KLEEN CUSTOMER NUMBER

A. The generator must determine if the material is excluded from regulation under 40 CFR 261.

- | | | | |
|---|---|-------------------------------------|--------------------------|
| | Yes | No | Not Sure |
| 1. Is this material exempt from waste regulations under RCRA (i.e. not a "solid waste" per 40 CFR 261.2?) | <input type="checkbox"/> (If Yes, Stop) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Is this waste exempt "used oil", for fuel or recovery, not disposal? (Ref. 40 CFR 279) | <input type="checkbox"/> (If Yes, Stop) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Is this waste exempt from regulation as a hazardous waste, per 261.4? If yes, explain why in Comments. | <input type="checkbox"/> (If Yes, Stop) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

IF ANY ANSWER IN SECTION A IS "YES", THEN STOP. EXEMPT WASTES DO NOT REQUIRE THIS CERTIFICATION.

B. The generator must determine if the waste is regulated as a "listed" hazardous waste.

- | | | | |
|---|-------|-------------------------------------|----------|
| | Yes | No | Not Sure |
| 1. Is waste listed as a hazardous waste in subpart D of 40 CFR part 261 (Ref. 40 CFR 261.31, 32, or 33)? | _____ | <input checked="" type="checkbox"/> | _____ |
| 2. Has waste been mixed with any other waste? (If yes, then describe other wastes in Comments.) | _____ | <input checked="" type="checkbox"/> | _____ |
| 3. Has waste been treated in any way? (If yes, then describe starting materials and explain in Comments.) | _____ | <input checked="" type="checkbox"/> | _____ |

C. Generator must determine if the waste is regulated for every characteristic under 40 CFR 261.30.

(Check one for each parameter or one for each section)

Is determination based on laboratory analysis? (If yes, then a copy of the analysis must be attached.)
 [Note that Safety-Kleen Corp. Prequalification Analysis may not be acceptable.]

	Yes	No	Partial
_____	_____	<input checked="" type="checkbox"/>	_____

Waste Code	Parameter (Evaluation method)	Yes	No	Not Sure	Waste Code	Parameter (Evaluation method)	Yes	No	Not Sure
D001	Ignitability (see attachment)	_____	<input checked="" type="checkbox"/>	_____	TCLP Volatiles (SW-846 8240)				
D002	Corrosivity (see attachment)	_____	<input checked="" type="checkbox"/>	_____	D018	Benzene	_____	<input checked="" type="checkbox"/>	_____
D003	Reactivity (see attachment)	_____	<input checked="" type="checkbox"/>	_____	D019	Carbon Tetrachloride	_____	<input checked="" type="checkbox"/>	_____
TCLP Metals (SW-846 6010 & 7000)					D021	Chlorobenzene	_____	<input checked="" type="checkbox"/>	_____
D004	Arsenic	_____	<input checked="" type="checkbox"/>	_____	D022	Chloroform	_____	<input checked="" type="checkbox"/>	_____
D005	Barium	_____	<input checked="" type="checkbox"/>	_____	D027	Dichlorobenzene, 1,4-	_____	<input checked="" type="checkbox"/>	_____
D006	Cadmium	_____	<input checked="" type="checkbox"/>	_____	D028	Dichloroethane, 1,2-	_____	<input checked="" type="checkbox"/>	_____
D007	Chromium	_____	<input checked="" type="checkbox"/>	_____	D029	Dichloroethylene, 1,1-	_____	<input checked="" type="checkbox"/>	_____
D008	Lead	_____	<input checked="" type="checkbox"/>	_____	D035	Methyl Ethyl Ketone	_____	<input checked="" type="checkbox"/>	_____
D009	Mercury	_____	<input checked="" type="checkbox"/>	_____	D039	Tetrachloroethylene	_____	<input checked="" type="checkbox"/>	_____
D010	Selenium	_____	<input checked="" type="checkbox"/>	_____	D040	Trichloroethylene	_____	<input checked="" type="checkbox"/>	_____
D011	Silver	_____	<input checked="" type="checkbox"/>	_____	D043	Vinyl Chloride	_____	<input checked="" type="checkbox"/>	_____
TCLP Pesticides (SW-846 8080 & 8150)					TCLP Semivolatiles (SW-846 8270)				
D012	Endrin	_____	<input checked="" type="checkbox"/>	_____	D023	Cresol, o-	_____	<input checked="" type="checkbox"/>	_____
D013	Lindane	_____	<input checked="" type="checkbox"/>	_____	D024	Cresol, m-	_____	<input checked="" type="checkbox"/>	_____
D014	Methoxychlor	_____	<input checked="" type="checkbox"/>	_____	D025	Cresol, p-	_____	<input checked="" type="checkbox"/>	_____
D015	Toxaphene	_____	<input checked="" type="checkbox"/>	_____	D026	Cresols (total)	_____	<input checked="" type="checkbox"/>	_____
D016	2,4-D	_____	<input checked="" type="checkbox"/>	_____	D030	Dinitrotoluene	_____	<input checked="" type="checkbox"/>	_____
D017	2,4,5-TP (Silvex)	_____	<input checked="" type="checkbox"/>	_____	D032	Hexachlorobenzene	_____	<input checked="" type="checkbox"/>	_____
D020	Chlordane	_____	<input checked="" type="checkbox"/>	_____	D033	Hexachlorobutadiene	_____	<input checked="" type="checkbox"/>	_____
D031	Heptachlor	_____	<input checked="" type="checkbox"/>	_____	D034	Hexachloroethane	_____	<input checked="" type="checkbox"/>	_____
					D036	Nitrobenzene	_____	<input checked="" type="checkbox"/>	_____
					D037	Pentachlorophenol	_____	<input checked="" type="checkbox"/>	_____
					D038	Pyridine	_____	<input checked="" type="checkbox"/>	_____
					D041	2,4,5-Trichlorophenol	_____	<input checked="" type="checkbox"/>	_____
					D042	2,4,6-Trichlorophenol	_____	<input checked="" type="checkbox"/>	_____

California Hazardous Characteristics (22 CCR 66261.24(a)(2)-(8))	_____	_____	_____	Waste Extraction Test (WET)	_____	_____	_____
				Static Acute Bioassay Procedure	_____	_____	_____

D. Comments Generator wants Full TCLP analysis performed for waste determination. Thinks material is nonhazardous (previous prequal. of material (cont. # 260380) 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. Hayes Sr Title Anna Container Manager
 Signature Robert F Hayes Sr Date 7/2/96 Phone (204) 377-3395
 Sales Representative Name Steve Curran Branch No. 62000

H EPA Waste Description and Treatment Standards

(COMPLETE ALL QUESTIONS WITHIN ONE SECTION ONLY).

CHECK ONE BOX ON LEFT

SK SURVEY NO.

1051795



IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (Ref. 40 CFR 261)

SECTION H-1

YES

1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes:

F001 F002 F003 F004 F005 F006 K086 Other, specify _____

Not Applicable

2. For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes.

D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011

Not Applicable

3. List all applicable State Waste Codes required by generating facility state: _____ None Required Not sure

SECTION H-2

NO

For explanation of "Exempt" wastes, see last page.

1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste" per 40 CFR 261.2)? (Ex. discarded unused product solvent for recovery; fuel oil for use as fuel)

Yes (Skip to 4) No

2. Is this waste an exempt "used oil", for fuel or recovery, not disposal? (Ref. 40 CFR 279) (Ex. automotive oils; machining oil; metal-working coolants; synthetic oil)

Yes (Skip to 4) No

3. Is this waste exempt from regulation as a hazardous waste, per 261.4? If yes, explain why in Comments. (Ex. sample for analysis, petroleum exploration and production from field wells)

Yes (Skip to 4) No

4. List all applicable State Waste Codes required by generating facility state: _____ None required Not sure

NOTE: IF ALL THE "NO" BOXES ARE CHECKED IN SEC H-2, THEN PLEASE FILL OUT A GENERATOR WASTE DETERMINATION CERTIFICATION OR SUBMIT A TCLP ANALYSIS.

H-3

When a generator is unable to identify the proper characterization of a waste to avoid delays and extra expense, Safety-Kleen's representative will draw a waste sample for a TCLP analysis and a Prequalification analysis.

I Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No. 54454
Type of sample: From Line From Tank Composite of one drums Sample taken by Customer Safety-Kleen Representative

J Generator Certification (Not a waste handling agreement):
On behalf of the Generator, I hereby warrant, represent, and certify that: all 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 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. Hayes Sr. Title Demo Container Manager
Signature X Robert F. Hayes Sr. Date 7/23/86 Phone (701) 399-3395
Contact _____ Title _____ Phone () _____
Comments Generator wants full TCLP analysis performed for waste determination. Thinks material is nonhazardous (previous prequal of material (incl. #260380) supports this).
Sales Representative Name Steve Church SK Employee Number 9412 Territory or Branch No. 4200

SK USE ONLY Sample leaked in transit Survey number did not match sample label Survey information incomplete
Sample Received _____ Completed Survey Received _____ Survey Logged _____
Comments _____
Survey Entered By _____ Date _____ Survey Verified By _____ Date _____
Analysis Entered By _____ Date _____ Data Verified By _____ Date _____



MATERIAL SURVEY

SK SURVEY NO. 1051795

SK 120 TRUCK	_____ - 64 - 1606 SAFETY-KLEEN CUSTOMER NUMBER	Control No. _____
	SK LINE OF BUSINESS # _____	Lab No. _____
	(EX. USE 24 FOR FRS, 28 FOR SKOS)	



A Generator Name Dana Container Corp.
 Nature of Business Container Cleaning (Trucks, Trucks) S.I.C. No. _____
 ID Numbers: Federal EPA NC 0074509950 State NC ID _____ State _____ ID _____
 Status: Large Quantity Generator (LQG) Small Quantity Generator (SQG) Conditionally Exempt Small Quantity Generator (CESQG)

B Facility Street Address (No P.O. Boxes) Manifest Address Billing Name & Address (If Different) Manifest Address
7254 Mt. Holly Rd. 210 E. Essex Ave.
 City Charlotte State NC Zip 28214 City Avenel State NJ Zip 07001

C General Description of Material Filter Press Debris
 Process Description Material From waste water Filter press
 Generation Amount 5000 Gallons
 Per Week Month Quarter Year One Time Only
 Gallons On Hand Drums Bulk
 Shipping Schedule ASAP Drums Bulk
 Physical Description: Color: White chalk
 Percent Solids that Could Not be Sampled 0
 Sampled Solids From Top of Drum Yes No (From collect)
 Sampled Solids From Bottom of Drum Yes No
 pH Range <=2.0 2-4 4-10 10-12.5 >=12.5
 Layers or Phases One Two Three
 Physical State Liquid Paste Solid

D Material Composition Vol % Wt % Max Typical
Crystalline Silica 100

 TOTAL (Typical should not exceed 100%) 100 %

E Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material.
 MSDS Attached EP Toxic Analysis attached TCLP analysis attached Other Analysis attached Other attachments No attachments

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.
 Yes No 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.
 Yes No 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).
 Yes No 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!
 Yes No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
 Yes No 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 DOT Hazardous Material Description
 Proper Shipping Name Silica (Not US DOT or USEPA Hazardous Material)
 Hazard Class _____ UN/NA Number _____ 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 _____

GENERATOR



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

19612

PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N C D 0 7 4 5 0 5 8 5 0 9 9 0 0 1		Manifest No. 99001		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is by State law.					
3. Generator's Name and Mailing Address Dana Container 7254 Mt. Holly Road Charlotte, NC 28214						A. State Manifest Document Number							
4. Generator's Phone (704) 399-3395						B. State Generator's ID							
5. Transporter 1 Company Name STAT, Inc.			6. U.S. EPA ID Number N C D 9 8 0 7 9 9 1 4 2			C. State Transporter's ID NCD980799142							
7. Transporter 2 Company Name						D. Transporter's Phone 704-396-2304							
9. Designated Facility Name and Site Address SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD SUMTER, SC 29150						E. State Transporter's ID							
10. U.S. EPA ID Number S C D 0 3 6 2 7 5 6 2 6						F. Transporter's Phone							
11. U.S. Dot Description (including Proper Shipping Name, Hazard Class, and ID Number) a. RQ, Waste Flammable Liquid, n.o.s., (contains ethyl acetate & methanol), 3, UN-1993, III (F003, F005, D001)						12. Containers No. Type 002 D M		13. Total Quantity 00096 GA		14. Unit GA		15. Waste Number F 0 0 3 F 0 0 5 D 0 0 1	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above a. S E - 1 4 4 2 0 - F 1 0 0 3						K. Handling Codes for Wastes Listed Above Use guide #26							
b.						c.							
15. Special Handling Instructions and Additional Information In case of fire or spill call Item A-RQ is 100 lbs. STAT, Inc. Contact Garry Sparks State origin of waste is NC 704-396-2304. After 5PM Call Work order #1637 Garry 704-754-2315 or Jerry 24 hr emergency #1-800-424-9300 Sparks 704-754-8737.						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. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.							
16. GENERATOR'S CERTIFICATION: (CHEMTREC) 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 is available to me and that I can afford.													
Printed/Typed Name CHARLEY FERRELL III				Signature Charley Ferrell III				Month Day Year 10/10/94					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Type Name WAYNE HALL				Signature Wayne Hall				Month Day Year 10/10/94					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name				Signature				Month Day Year					
19. Discrepancy Indication Space 14 A - 6 a 689 lbs. c lbs. b lbs. d lbs.													
20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.													
Printed/Typed Name ALEXANDER				Signature O. Alexander				Month Day Year 10/10/94					

GENERATOR

TRANSPORTER

FACILITY



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste
2600 Bull Street, Columbia, SC 29204
Phone: (803) 734-5200
Emergency & Holidays: (803) 734-5200

PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter) Form Approved. OMB No. 2050-0046

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No. _____ Manifest Document No. _____

2. Page 1 of _____ Information in the shaded areas required by Federal law

Generator's Name and Mailing Address _____

A. State Manifest Document No. _____

Generator's Phone (____) _____

B. State Generator's ID No. _____

Transporter 1 Company Name _____ 6. U.S. EPA ID Number _____

C. State Transporter's ID No. _____

STAT. _____

D. Transporter's Phone _____

Transporter 2 Company Name _____ 8. U.S. EPA ID Number _____

E. State Transporter's ID No. _____

F. Transporter's Phone _____

Designated Facility Name and Site Address _____ 10. U.S. EPA ID Number _____

G. State Facility's ID No. _____

SOUTHEASTERN CHEMICAL AND SOLVENT
55 INDUSTRIAL ROAD
SUMTER, SC 29150
S C D 0 3 6 2 7 5 6 2 6

H. Facility's Phone _____ 803-77-____

U.S. Dot Description (including Proper Shipping Name, Hazard Class, and ID Number) _____

12. Containers No. _____ Type _____

13. Total Quantity _____

14. Unit Wtd. _____

Waste Material Name, Quantity, and State & method of disposal _____

Final Descriptions for Materials Listed Above _____

K. Handling Codes for Wastes Listed Above _____

a. _____ b. _____ c. _____ d. _____

_____ #26

Special Handling Instructions and Additional Information _____

Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for treatment, storage and disposal facilities, and 10 minutes for reviewing instructions, gathering data, and completing the form. Send comments regarding this burden estimate or any aspect of the collection of information, including suggestions for reducing this burden, to Chief, Information Management, U.S. Environmental Protection Agency, 401 M Street, NW, Washington, D.C. 20460; and to the Office of Management and Budget, Paperwork Project, Washington, D.C. 20503.

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and quantity, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations 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 and technically 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 option that is available to me and that I can afford.

Typed Name _____ Signature _____

Month _____ Day _____

Transporter 1 Acknowledgement of Receipt of Materials

Typed Name _____ Signature _____

Month _____ Day _____

Transporter 2 Acknowledgement of Receipt of Materials

Typed Name _____ Signature _____

Month _____ Day _____

Discrepancy Indication Space
a. _____ lbs. c. _____
b. _____ lbs. d. _____

Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Typed Name _____ Signature _____

Month _____ Day _____



SOUTHEASTERN CHEMICAL

CUSTOMER COPY

GENERATORS NOTIFICATION OF TREATMENT REQUIREMENTS FOR WASTES RESTRICTED FROM LAND DISPOSAL UNDER 40 CFR 268 SUBPART D

MANIFEST NUMBER:

EPA ID NUMBER: AL0074505850

EPA WASTE CODE: F001, F002, F003

PROFILE NUMBER: SA-10420-F003

TREATMENT STANDARDS

Table with columns: Check Here If Contained In Waste, Waste Water mg/l, All Other mg/l. Lists various solvents and their treatment levels.

Table with columns: D Codes, Description, Wastewaters, Nonwastewaters. Lists codes like D001, D002 and their corresponding treatment standards.

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 [Handwritten Signature] TITLE Compliance Mgr.

GENERATOR NAME/LOCATION: Southeastern Chemical, 7254 Milliken Rd, Charlotte NC 28214

NOTE: PLEASE ATTACH WASTE ANALYSIS DATA. (OPTIONAL) DATE:

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. HOLLY RD PHONE (704) 399-3395

CITY CHARLOTTE STATE N.C. ZIP 28214

EPA ID. NO. / MANIFEST NCD 074505850 / 94001
DOCUMENT NO.

ACCUMULATION START DATE 7-28-93 EPA F001, F003
WASTE NO. D001

"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 which indicates your status in regard to the reporting requirements under 40 CFR Part 61 Subpart FF. This statement must accompany each shipment regardless of whether the referenced regulation is applicable 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: Charley Ferrell III

Date: 1.16.94

Print Name and Title: CHARLEY FERRELL III Compliance Mgr.

Stream: SE - 14420 - F003

30-91

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OMNI CHEMICALS, INC.

CERTIFICATE OF RECYCLING/MATERIALS RE-USE

Generator: **DANA CONTAINER**
Address: **7254 MT HOLLY ROAD**
CHARLOTTE NC 28214

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

GENERATOR INFORMATION:

NAME Dana Container

ADDRESS 7254 Mt Holly Road

CITY Charlotte STATE NC ZIP 28214

EPA ID NO. NC D074505850 EPA WASTE NO. F003 F005 D001

ACCUMULATION START DATE _____ MANIFEST DOCUMENT NO. _____

[RQ, Waste Flammable Liquid, n.o.s.
(contains formaldehyde) 3, UN-1993,
PGII]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

IS 00001

omni the total solution.

January 19, 1994

Dana Container
7254 Mt Holly Road
Charlotte NC 28214

ATTN: Charley Ferrell III

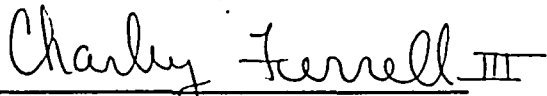
Dear Mr. Ferrell:

Please be advised that on January 6 1994, we received a waste shipment from your company under Hazardous Waste Manifest 94001. The following discrepancies were noted for which corrective actions are required.

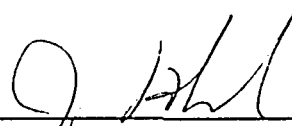
14a. should be G instead of Ga.

The discrepancies and the corrective actions have been highlighted 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 initial. 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 CHEMICAL & SOLVENT
Joy Alexander

encl: Manifest

(7043993395)



South Carolina Department of Health and Environmental Control

BA7152
 Bureau of Solid & Hazardous Waste Mgt.
 2600 Bul. 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) typewriters Form Approved OMB No 2050-0039 Expires 9-30-9

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's U.S. EPA ID No
 M, D, D, 9, 8, 0, 5, 5, 5, 1, 8, 9, 0, 2, 3, 8, 5

Manifest Document No
 12131815

Page 1 of 1

Information in the shaded areas is not required by Federal law, but is by State law

3. Generator's Name and Mailing Address Clean Harbors of Baltimore, Inc. 1910 Russell St. Baltimore, MD 21230		A. State Manifest Document Number	
4. Generator's Phone 410-244-8200		B. State Generator's ID Same	
5. Transporter 1 Company Name Clean Harbors Env. Services, Inc.		C. State Transporter's ID	
6. U.S. EPA ID Number MAID1013191312121510		D. Transporter's Phone 617-849-1800	
7. Transporter 2 Company Name Clean Harbors ENV Services, Inc		E. State Transporter's ID	
8. U.S. EPA ID Number MAID1013191312121510		F. Transporter's Phone 617-849-1800	
9. Designated Facility Name and Site Address Giant Resource Recovery SC Highway 453 North @ I-26 Harleyville, SC 29448		G. State Facility's ID	
10. U.S. EPA ID Number SCD003351699		H. Facility's Phone 803-496-7676	

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste Number
a. RO, Waste Flammable Liquid, N.O.S (Methyl Ethyl Ketone, Xeosene), 3, UN1993, PGII	11	310.54	G	01001 10002
b.				
c.				
d.				

J. Additional Descriptions for Materials Listed Above	K. Handling Codes for Wastes Listed Above
a. [H1V] - [F1, O1, 4, 5, 7] - [M1, 3, 3, 1]	c. [] - [] - []
b. [] - [] - []	d. [] - [] - []

15. Special Handling Instructions and Additional Information

HWH# 160 DC# 03197 VC# 0011, 0018, 0021, 0035, 0039, F005, U002, U220, 52855 9AA2193 U234, F003

IN CASE OF EMERGENCY CALL 1-800-OIL-TANK ERG# 27

P.D.C. reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 16 minutes for treatment, storage, and disposal facilities. This includes the time for reviewing instructions, gathering data and completing and reviewing the form. Send comments regarding this burden estimate including suggestions for reducing this burden to Chief Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St. SW, Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

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 the laws of the State of South Carolina.

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Printed/Typed Name: Barry Taggart Signature: Barry Taggart Month/Day/Year: 03/18/94

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name: Keith Johnston Signature: Keith Johnston Month/Day/Year: 03/18/94

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name: David Butler Signature: David Butler Month/Day/Year: 03/18/94

19. Discrepancy Indication Space

a. [22100] CS c. [] OS
 b. [] OS d. [] OS

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19
 Printed/Typed Name: Signature: Month/Day/Year:



South Carolina Department of Health and Environmental Control

BA7152
Bureau of Solid & Hazardous Waste Mgt.
2600 Bul. Street Columbia, SC 29202
Phone (803) 734-5200
Emergency & Holidays (803) 253-6488

PLEASE PRINT or TYPE Form designed for use on elite (12-pin) typewriter Form Approved OMB No 2050-0039 Expires 9-30-9

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's U.S. EPA ID No
M, D, D, 9, 8, 0, 5, 5, 1, 8, 9, 0, 3, 1, 8, 5

Manifest Document No
2 Page 1 of 1

Information in the shaded areas is not required by Federal law but is by State law

3 Generator's Name and Mailing Address Clean Harbors of Baltimore, Inc. 1910 Russell St. 410-244-8200 Baltimore, MD 21230		A. State Manifest Document Number B. State Generator's ID Same	
4 Generator's Phone		C. State Transporter's ID	
5 Transporter 1 Company Name Clean Harbors Env. Services, Inc.		6 U.S. EPA ID Number MAID103191312121510	
7 Transporter 2 Company Name Clean Harbors ENV Services, Inc.		8 U.S. EPA ID Number MAID103191312121510	
9 Designated Facility Name and Site Address Giant Resource Recovery SC Highway 453 Northh @ I-26 Harleyville, SC 29448		10 U.S. EPA ID Number SC, D, 0, 0, 3, 3, 5, 1, 6, 9, 9	
11 U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12 Containers No. Type	
a RQ, Waste Flammable Liquid, N.O.S (Methyl Ethyl Ketone, Kerosene), 3, UN1993, PGII		1 T T 31054	
b			
c			
d			
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above	
a H V - F 0 4 5 7 - M 3 3 1 1		c	
b		d	
15 Special Handling Instructions and Additional Information HWH# 160 DC# 53197 52355 VC# 0011, 0018, 0021, 0035, 0039, F003, U002, U220, 9AA2193 U234, F003 IN CASE OF EMERGENCY CALL 1-800-OIL-TANK ERG# 27			
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 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.			
Printed/Typed Name Barry Taggart		Signature <i>Barry Taggart</i>	
Month Day Year 03 18 94			
17 Transporter 1 Acknowledgement of Receipt of Materials			
Printed/Typed Name KEITH JOHNSTON		Signature <i>Keith Johnston</i>	
Month Day Year 03 19 94			
18 Transporter 2 Acknowledgement of Receipt of Materials			
Printed/Typed Name David Butler		Signature <i>David Butler</i>	
Month Day Year 03 21 94			
19 Discrepancy Indication Space			
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19			
Printed/Typed Name Kinnda Williams		Signature <i>Kinnda Williams</i>	
Month Day Year 03 21 94			

GENERATOR

TRANSPORTER

FACILITY

BUCKET 21 00012

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 FLAMMABLE LIQUID UN OR NA NO. 1993

GENERATOR INFORMATION

NAME DANA CONTAINER

ADDRESS 7254 MT. HOLLY RD. PHONE (704) 399-3395

CITY CHARLOTTE STATE N.C. ZIP 28214

EPA ID. NO. NC0074505850 EPA WASTE NO. D001

ACCUMULATION START DATE 3/23/94 MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME FLAMMABLE WASTE LIQUID

TECHNICAL CHEMICAL NAME -

UN OR NA ID. NO. UN 1993

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

~~Heritage~~

Clean Harbor.

LI 00013
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 FLAMMABLE WASTE LIQUID UN OR NA NO. 1993

GENERATOR INFORMATION

NAME DANA CONTAINER

ADDRESS 7254 MT. HOLLY RD PHONE (704) 399-3395

CITY CHARLOTTE STATE NC ZIP 28214

EPA ID. NO. NC0074505850 EPA WASTE NO. D001

ACCUMULATION START DATE 3/20/94 MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME FLAMMABLE WASTE LIQUID.

TECHNICAL CHEMICAL NAME _____

UN OR NA ID. NO. UN 1993

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

~~Heritage~~

Clean Harbor



South Carolina Department of Health and Environmental Control

BA152
Bureau of Solid & Hazardous Waste Mgt.
2600 Bul. Street Columbia SC 29201
Phone (803) 733-5200
Emergency & Holidays (803) 253-6488

PLEASE PRINT or TYPE Form designed for use on elite 112-cinch typewriter Form Approved OMB No 2050-0039 Expires 9-30-95

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's U.S. EPA ID No: M, D, D, 9, 8, 0, 5, 5, 5, 1, 8, 9, 0, 2, 3, 8, 5
Manifest Document No: 2 Page 1 of 1

Information in the shaded areas is not required by Federal law but is by State law

3. Generator's Name and Mailing Address Clean Harbors of Baltimore, Inc. 1910 Russell St. Baltimore, MD 21230	A. State Manifest Document Number
4. Generator's Phone ()	B. State Generator's ID Same
5. Transporter 1 Company Name Clean Harbors Env. Services, Inc.	C. State Transporter's ID
6. U.S. EPA ID Number MAID10393222510	D. Transporter's Phone 617-849-1800
7. Transporter 2 Company Name Clean Harbors Env Services, Inc	E. State Transporter's ID
8. U.S. EPA ID Number MAID10393222510	F. Transporter's Phone 617-585-5111
9. Designated Facility Name and Site Address Giant Resource Recovery SC Highway 453 North @ I-26 Harleyville, SC 29448	G. State Facility's ID
10. U.S. EPA ID Number SCD003351699	H. Facility's Phone 803-496-7676

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit	15. Waste Number
	No.	Type			
a. RQ, Waste Flammable Liquid, N.O.S (Methyl Ethyl Ketone, Kerosene), 3, UN1993, PGII	1	T	310.54	G	01001 10002
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above	K. Handling Codes for Wastes Listed Above
a. [H1V]-[F10457]-[M331] c. []-[]-[]	
b. []-[]-[] d. []-[]-[]	

15. Special Handling Instructions and Additional Information
 HWH# 160 DC# 63797 VCI# 0011, 0018, 0021, 0035, 0039, F005, U002, U220, 9AA2193 U237, F003
 52855 ERG# 27

Pub. 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 this burden estimate including suggestions for reducing this burden to Chief Information Policy Branch PM-223 U.S. Environmental Protection Agency 401 M St SW Washington DC 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget Washington DC 20503

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 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.

Printed/Typed Name: Barry Taggart Signature: *Barry Taggart* Month Day Year: 10 31 89

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name: KEITH JOHNSTON Signature: *Keith Johnston* Month Day Year: 10 31 89

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name: David Butler Signature: *David Butler* Month Day Year: 10 30 1994

19. Discrepancy Indication Space
 a. [22100] CS c. [] CS
 b. [] CS d. [] CS

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19
 Printed/Typed Name: *Kimberly Sims* Signature: *Kimberly Sims* Month Day Year: 10 29 94

FLAMMABLE LIQUID
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 **FLAMMABLE LIQUID** UN OR NA NO. _____

GENERATOR INFORMATION

NAME **DANA CONTAINER**

ADDRESS **7254 MT. HOLLY** PHONE **704 597-3325**

CITY **CHARLOTTE N.C.** STATE _____ ZIP **28214**

EPA ID. NO. **NC D01000000** EPA WASTE NO. **D001-F003**

ACCUMULATION START DATE **3-11-94** MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME **FLAMMABLE LIQUID**

TECHNICAL CHEMICAL NAME **MOTOR OIL, FUEL OIL**

UN OR NA ID. NO. **1993**

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

FLAMMABLE LIQUID

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. HOLLY PHONE (704) 399-3395

CITY CHARLOTTE STATE N.C. ZIP 28214

EPA / MANIFEST ID. NO. / DOCUMENT NO. NC0074505850

ACCUMULATION START DATE 12-22-93 EPA WASTE NO. _____

(FLAMMABLE LIQUID)

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

FL 00019
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 FLAMMABLE LIQUID UN OR NA NO. 1993

GENERATOR INFORMATION

NAME DANA CONTAINER

ADDRESS 1254 MT. HOLLY RD. PHONE _____

CITY CHARLOTTE, STATE N.C. ZIP 28214

EPA ID. NO. NC0074505850 EPA WASTE NO. D001-F003

ACCUMULATION START DATE 5-23-94 MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME FLAMMABLE LIQUID.

TECHNICAL CHEMICAL NAME _____

UN OR NA ID. NO. D001-F003

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

FL 00019

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 ALPHA-NAPHTHA UN OR NA NO. 2811

GENERATOR INFORMATION

NAME DANA CONTAMER

ADDRESS 7254 MT. HOLLY RD PHONE (704) 399-3395

CITY CHARLOTTE STATE NC ZIP 28214

EPA ID. NO. NC0074505850 EPA WASTE NO. _____

ACCUMULATION START DATE 3/23/94 MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME ALPHA NAPHTHA

TECHNICAL CHEMICAL NAME NAPHTHAL

UN OR NA ID. NO. U.V. 2811

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

IL 00007

MATLACK

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 ALPHA-NAPTHA UN OR NA NO. 2811

GENERATOR INFORMATION

NAME DANA Container
ADDRESS 7254 MT. HOLLY Rd PHONE (704) 399-3395
CITY CHARLOTTE STATE N.C. ZIP 28214

EPA ID. NO. NC0074505850 EPA WASTE NO. _____

ACCUMULATION START DATE 3/23/94 MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME ALPHA-NAPTHA

TECHNICAL CHEMICAL NAME NAPTHAL

UN OR NA ID. NO. U.N. 2811

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

IL 00006

MATLACR

LOCATION: CHARLOTTE, NC

DOT SHIPPING NAME: ALPHA-NAPHTHA

TWO MAIN CONSTITUENTS: SAME & _____

___ NON-HAZARDOUS HAZARDOUS D001 ___ TCLP ___ LISTED WASTE

ACCUMULATION START DATE: 3-23-94

CONTAINER NUMBER: I100006

DATE	WORK ORDER #	PRODUCT	PH	GALONS
------	--------------	---------	----	--------

		<u>ALPHA-NAPHTHA</u>		<u>35.00</u>
		<u>Caustic</u>		<u>20.00</u>

~~35.00~~
~~20.00~~

Full

COMMENTS: _____

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 ALPHA-NAPTHA UN OR NA NO. 2811

GENERATOR INFORMATION

NAME DANA CONTAINER
ADDRESS 7254 MT. HOLLY RD. PHONE (704) 399-3325
CITY CHARLOTTE STATE NC. ZIP 28214

EPA ID. NO. NC D074605850 EPA WASTE NO. D002

ACCUMULATION START DATE 3/23/94 MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME ALPHA-NAPHTHA

TECHNICAL CHEMICAL NAME NAPHTHAL

UN OR NA ID. NO. U.N. 2811

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

IL ~~000000~~ 00015

MATLACK

11 00014
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 FLAMMABLE LIQUID UN OR NA NO. 1993

GENERATOR INFORMATION

NAME DANA CONTAINER

ADDRESS 7254 MT HOLLY Rd PHONE _____

CITY Charlotte STATE NC ZIP 28214

EPA ID. NO. UCD074505850 EPA WASTE NO. D001

ACCUMULATION START DATE 3/23/94 MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME FLAMMABLE LIQUID

TECHNICAL CHEMICAL NAME _____

UN OR NA ID. NO. UN. 1993

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!



NORTH CAROLINA HAZARDOUS WASTE MANIFEST

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D 0 7 4 5 0 5 8 5 0 9 4 1 0 0 3		Manifest Document No. 09410013		2. Page 1 of 1		Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address Dana Container .7254 Mt. Holly Road Charlotte, NC 28214		4. Generator's Phone (704) 399-3395		5. Transporter 1 Company Name STAT, Inc.		6. US EPA ID Number N C D 9 8 0 7 9 9 1 4 2		A. State Manifest Document Number	
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address Laidlaw Environmental Services (TS), Inc. 208 Watlington Industrial Drive Reidsville, NC 27320		10. US EPA ID Number N C D 0 0 0 6 4 8 4 5 1		B. State Generator's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. Hazardous Waste Liquid, n.o.s., (contains tetrahydrofuran) 9, NA-3082, PG II (D001)		001 DM 001 055 G						D001	
b. RQ, Waste Flammable Liquid, n.o.s., (contains alpha naptha) 3, UN-1993, PG III (D001)		003 DM 001 165 G						D001	
c. RQ, Waste Flammable Liquid, n.o.s., (contains methyl ethyl ketone & kerosene) 3, UN-1993 PG III (F002, F003, F005, D001, D011, D018, D021, D035, D039, U002, U039, U220)		006 DM 003 30 G						F002, F003, F005, D001, D011, D018, D021, D035, D039, U002, U039, U220	
d.									
J. Additional Description for Materials Listed Above Item A-approval #RVID0101 Items B & C-RQ is 100 lbs. Item B-approval #RVID0102 State origin of waste is NC Item C-approval #RVID0103 Work order #1734		K. Handling Codes for Wastes Listed Above Items A-C use guide #26							
15. Special Handling Instructions and Additional Information In case of fire or spill call STAT, Inc. Contact Garry Sparks 704-396-2304. After 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, 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.									
Printed/Typed Name CHARLEY FERRELL III		Signature <i>Charley Ferrell III</i>		Month Day Year 06 02 94					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name RONNIE SPARKS		Signature <i>Ronnie Sparks</i>		Month Day Year 06 02 94					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year					
19. Discrepancy Indication Space Line C Blank should include waste no U239 instead of U039 B should read (RQ) Waste Flammable Liquids Composite, n.s. 3 UN2924 PG III (D001) 22 (alpha naptha) Blank should have D002 as the waste no. instead of D001 Ref. RVID0104									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name DAVID WILLIS		Signature <i>David Willis</i>		Month Day Year 06 06 94					



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 ID: NCU07450585U

Manifest No: RVIDO-940U3

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 RVIDO101	06/22/94	LAIDLAW ENVIRONMENTAL SERVICES (TOC), INC. ROEBUCK SC	INCINERATION
940606-RVIDO-002 RVIDO102	06/14/94	LAIDLAW ENVIRONMENTAL SERVICES (TOC), INC. ROEBUCK SC	INCINERATION
940606-RVIDO-003 RVIDO102	06/14/94	LAIDLAW ENVIRONMENTAL SERVICES (TOC), INC. ROEBUCK SC	INCINERATION
940606-RVIDO-004 RVIDO102	06/14/94	LAIDLAW ENVIRONMENTAL SERVICES (TOC), INC. ROEBUCK SC	INCINERATION
940606-RVIDO-005 RVIDO103	07/08/94	LWD, INC. CALVERT CITY KY	INCINERATION
940606-RVIDO-006 RVIDO103	06/15/94	GIANT CEMENT COMPANY HARLEYVILLE SC	FSUBS
940606-RVIDO-007 RVIDO103	06/17/94	GIANT CEMENT COMPANY HARLEYVILLE SC	FSUBS
940606-RVIDO-008 RVIDO103	06/17/94	GIANT CEMENT COMPANY HARLEYVILLE SC	FSUBS
940606-RVIDO-009 RVIDO103	06/17/94	GIANT CEMENT COMPANY HARLEYVILLE SC	FSUBS
940606-RVIDO-010 RVIDO103	06/15/94	GIANT CEMENT COMPANY HARLEYVILLE SC	FSUBS

Thomas W. Collins

Operations

Date: 07/23/94

HAZMAT

DATE **9324**
9/11/96ENVIRONMENTAL GROUP, INC. FAX (716) 827-7217
60 Commerce Drive, Buffalo, NY 14218 (716) 827-7200NYDEC # 9A-278
EPA ID# NYD980769947**PICK UP** **DELIVERY**

S H I P P E R	NAME <i>JANA CONTAINER CORP</i>		
	STREET <i>1254 Mt. Holly Rd,</i>		
	CITY <i>CHARLOTTE</i>	STATE <i>NC</i>	ZIP CODE
	CONTACT NAME	PHONE	
	SCHEDULED TIME <i>7-11-96</i>		

C O N S I G N E E	NAME <i>SAFETY KLEEN</i>		
	STREET <i>3700 LABRANCE RD.</i>		
	CITY <i>NEWCASTLE</i>	STATE <i>NY</i>	ZIP CODE
	CONTACT NAME	PHONE	
	SCHEDULED TIME		

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. <i>381605</i>	WORK ORDER NUMBER	MANIFEST NUMBER <i>41176</i>	H.M. NUMBER <i>64872</i>
LOAD NUMBER <i>H1164872</i>	TRACTOR NUMBER <i>125</i>	TRAILER NUMBER <i>852</i>	DRIVER'S NAME <i>DON DAVIS</i>

TYPE (CIRCLE ONE)	MATERIAL DESCRIPTION	QUANTITY
STRAIGHT TRUCK TANK (S/S) VAC DUMP <input checked="" type="checkbox"/> VAN ROLL-OFF BOX # FLATBED	<i>WASTE CORROSIVE LIQUID, 8</i> <i>WASTE SOLIDS, 9</i>	<i>1 DM</i> <i>4 DM</i>

PICK UP	
PICK UP DATE <i>7-11-96</i>	
ARRIVAL TIME <i>1400</i> AM/PM	RELEASE TIME <i>1430</i> AM/PM
DAY # 2 DATE	
ARRIVAL TIME AM/PM	RELEASE TIME AM/PM
TRAILER EMPTY UPON ARRIVAL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
(If not, explain below—)	
DIP MEASUREMENT (Tankers Only) _____ INCHES	
COMMENTS: (EXPLAIN ALL DELAYS) <i>Load - SAFETY WORK</i>	
HAZMAT MATERIALS USED (ex. overpacks, etc): <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
IF YES EXPLAIN:	
I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.	

DELIVERY	
DRIVER _____	DAY #1 DATE _____
ARRIVAL TIME AM/PM	RELEASE TIME AM/PM
DAY #2 DATE	ARRIVAL TIME AM/PM
DAY #3 DATE	ARRIVAL TIME AM/PM
TRAILER CLEAN AND EMPTY UPON DEPARTURE <input type="checkbox"/> YES <input type="checkbox"/> NO	
(If not, explain below—)	
COMMENTS: (Explain all delays or discrepancies)	
I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.	

SHIPPER'S SIGNATURE *Robert J. Hayes* Date *7-11-96*

CONSIGNEE'S SIGNATURE _____ Date _____

WTLAND D1 SAL RESTRICTION CERTIFICATION NO. LATON FORM

Generator Name: Dave Container Corp. Manifest Document Number: 91196
 Generator USEPA ID#: NC1074505850

Check One: Wastewater Non-wastewater ✓
 In accordance with 40 CFR 268.7, I have listed the necessary information to properly certify and/or manage this waste(s) in accordance with the Land Disposal Restriction standards as set forth in 40 CFR 268 and any applicable prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d).

Manifest Line #	Waste Code, Subcategory and/or Constituents of Concern	UHCS * Yes/No/NA	Certification* Notification	Manifest Line #	Waste Code, Subcategory and/or Constituents of Concern	UHCS * Yes/No/NA	Certification* Notification
11a	U188	NA	A				
11b	D002	Yes	A				
11c	D003	Yes	A				

UHCS
 Complete and attach an Underlying Hazardous Constituents Form if Underlying Hazardous Constituents (UHCS) are present and the waste contains any of the USEPA Waste Codes: D001 (except High TOC Ignitable Liquids Subcategory or is treated by CMBST or RORGS 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 P001-P005, P039.

Certification/Notification

- A: This waste does NOT meet applicable treatment standards as set forth by 40 CFR 268, or, applicable prohibition levels set forth in 40 CFR 268.32, or, RCRA section 3004(d) and requires further treatment before land disposal.
- B: 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 treatment standards specified in 40 CFR part 268, subpart D and all applicable prohibitions set 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 significant penalties for submitting a false certification, including the possibility of fine and imprisonment. (268.7(a)(2)(vii))
- C: I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack does not contain any wastes identified at Appendix IV to Part 268. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment. (268.7(a)(8))
- D: 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 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 prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. 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))
- E: I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment. (268.7(b)(5)(ii))
- F: 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 support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater or gaseous constituents have been treated by incineration in units operated in accordance with 40 CFR part 264, subpart O or 40 CFR part 265, subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater or gaseous constituents, despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment. (268.7(b)(5)(iii))
- G: I certify under penalty of law that the debris have been treated in accordance with the requirements of 40 CFR 268.45. I am aware that there are significant penalties for making a false certification, including the possibility of fine and imprisonment. (268.7(d)(3)(iii))
- H: 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. This decharacterized waste contains underlying hazardous constituents 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)(5)(v))
- I: 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 Standard. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment. (268.7(b)(5)(v))

Signature: Robert J. Muehle Title: Dave Container Mgr Date: 09/11/96
 I hereby certify that I believe that the information I submitted herein is true, accurate, and complete.

Waste 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.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D 0 7 4 5 0 5 8 5 0 9410013		2. Page 1 of 1		3. Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address Dana Container 7254 Mt. Holly Road Charlotte, NC 28214				A. State Manifest Document Number		B. State Generator's ID	
4. Generator's Phone (704) 399-3395		6. US EPA ID Number		C. State Transporter's ID NCD980799142		D. Transporter's Phone 704-396-2304	
5. Transporter 1 Company Name STAT, Inc.		7. Transporter 2 Company Name		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Laidlaw Environmental Services (TS), Inc. 208 Watlington Industrial Drive Reidsville, NC 27320				10. US EPA ID Number N C D 0 0 0 6 4 8 4 5 1		G. State Facility's ID NCD000648451	
				H. Facility's Phone 1-800-334-5943			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity	
a. Hazardous Waste Liquid, n.o.s., (contains tetrahydrofuran) 9, NA-3082, PG II (D001)				0010M001055 G		D00	
b. RQ, Waste Flammable Liquid, n.o.s., (contains alpha naphtha) 3, UN-1993, PG III (D001)				01030M001165 G		D00	
c. RQ, Waste Flammable Liquid, n.o.s., (contains methyl ethyl ketone & kerosene) 3, UN-1993 PG III (F002, F003, F005, D001, D011, D018, D021, D035, D039, U002, U039, U220)				01060M00330 G		F002, F003, F005, D001, D011, D018, D021, D035, D039, U002, U039, U220	
d.							
J. Additional Description for Materials Listed Above Item A-approval #RVID0101 Item B-approval #RVID0102 Item C-approval #RVID0103				Items B & C-RQ is 100 lbs. State origin of waste is NC Work order #1734		K. Handling Codes for Wastes Listed Above Items A-C use gu	
15. Special Handling Instructions and Additional Information In case of fire or spill call STAT, Inc. Contact Garry Sparks 704-396-2304. After 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, 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.							
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name CHARLEY FERRELL III				Signature Charley Ferrell III		Month Day Year 06/02/94	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name RONNIE SPARKS				Signature Ronnie Sparks		Month Day Year 06/02/94	
19. Discrepancy Indication Space Line C Blank should include waste no 4239 instead of 4039 B should read (RQ) Waste Flammable Liquids Composite, n.s. 3 in 2924 PG III (D001) RQ (alpha naphtha) Blank should have D002 as the waste no. instead of D001 Ref. RVID 104							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name DAVID WILLIS				Signature David Willis		Month Day Year 06/06/94	



NAME OF WASTE STREAM

MATERIAL PROFILE NO

Alpha Naptha

RVIDO 1041

New Amendment

A. GENERATOR INFORMATION

Generator Name DANA Containers
Facility Address 2254 Mount Holly Road

City/County Charlotte
State NC Zip Code 28214
USEPA ID# NC0074505850
State ID# _____

Technical Contact David Haynes
Telephone 604396-4319 EXT. _____
Fax () _____
Billing Name Industrial Brokerage Services
Billing Address P.O. Box 1263

City Lenoir State NC Zip Code 28645
Attention _____
Telephone () _____ EXT. _____

B. DOT Shipping Name Waste Flammable Liquids,
Corrosive, N.O.S., 3, UN 2924, III
Hazard Class 3
UN/NA No. UN 2924 Packing Group III RO _____

D. ANNUAL REPORT CODES
SIC Code: _____
Source Code: A
Form Code: B
Origin Code: _____
System Type: M

E. OTHER COMPONENTS
No Yes Total ppm
PCB's _____
Cyanides _____
Sulfides _____
Pesticides _____
Phenolics _____
Dioxins _____
Halogens _____%

C. RCRA RCRA Non Hazardous/Exempt? Yes No Process Generating: Tank Clean Out
State Waste Codes: _____ EPA Waste Codes: D002

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 _____

 Gas (Cylinder) Solid _____%
 Aerosol Sludges _____%
 Lab-Pack Free Liquids 100%

Layers
 Single Layered Bi-layered Multi-layered
Viscosity
 Low Medium High
Odor
 None Mild Strong Describe: Solvent
Color/Appearance: Opaque li

Weight
Density _____ lbs./gal. (US, liq) _____ lbs./cu. foot
Dry Weight <1.0% 5-20%
 1-5% 20-100%
pH N/A
 0-2 4.1-10 ≥ 12.5
 2.1-4 10.1-12.4 Exact 13
Flash Point (liquid only)
 <73°F (23°C)
 73-140°F (23-60°C)
 142-200°F (61-93°C)
 >200°F (93°C)
 N/A
Boiling Point
 <95°F (35°C)
 >95°F (35°C)
 N/A
BTU/Lb. 6-8,000

Dermal Toxicity LD₅₀ (Mg/Kg)
 ≤40 >200, ≤1000
 >40, ≤200 >1000
4. Material poisonous by inhalation? Yes No
Oral Toxicity LD₅₀ (Mg/Kg).
 ≤5 >5, ≤50
Solids: >50, ≤200 >200
Liquids: >50, ≤500 >500

5. Is this waste stored in vented drums? Yes No
6. Is this waste pumpable? Yes No
7. Is this waste polymerizable? Yes No
8. Is waste stream subject to the National Emission Standards for Benzene Waste Operations (40 CFR 61 Subpart FF)? Yes No
9. Is this waste regulated as an ozone depleting substance (40 CFR part 82)? Yes No
10. Does this waste contain scrap metal pieces greater than 2 inches in size? Yes No

H. PHYSICAL/CHEMICAL CONSTITUENTS
Alpha Naptha 20-30 %
Caustic Wash 2-40 %
Water 5-60 %

100 %

G. METALS
 NONE TCLP (MG/L) TOTAL (PPM)

	Reg. Limit	Below	Above	Range
Arsenic	5 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Barium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Cadmium	1 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Chromium	5 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Copper		<input type="checkbox"/>	<input type="checkbox"/>	_____
Lead	5 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Mercury	0.2 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Nickel	134 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Selenium	1 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Silver	5 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	_____
Zinc		<input type="checkbox"/>	<input type="checkbox"/>	_____
Others:				_____

I. ANTICIPATED VOLUME

Qty.	Container	Qty.	Container
<input type="checkbox"/>	5 gal. pail	<input type="checkbox"/>	Cubic Yard Box
<input type="checkbox"/>	15 gal. carboy	<input type="checkbox"/>	Super Sack*
<input type="checkbox"/>	30 gal. drum	<input type="checkbox"/>	Rolloff/Dump Trailer
<input type="checkbox"/>	55 gal. drum	<input type="checkbox"/>	Tanker*
<input type="checkbox"/>	85 gal. drum	<input type="checkbox"/>	Other _____

Per 1 Time Week Month
 Year Other _____

(* Is this waste regulated as a Marine Pollutant (49 CFR 171.8)? Yes No

(Attach All 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 materials tested are representative of all material described by this profile.
Generator's Authorized Signature: Charles Ferrer Date 7-5-94



CUSTOMER NOTIFICATION AND CERTIFICATION

Only Statements with Original Signatures will be Accepted!

Generator Name/Location: Dana Containers 2254 MH Holly Rd Charlotte NC 28214

EPA I.D. Number: NCWA14505850

Waste Profile or ARF Designation: RVID0101 RVID0102 RVID0103

Manifest Number: 94003

EPA Hazardous Waste Number(s): F001, D011, H021, H035, D039, F002, F003, F005, U002, U039, U050

Waste Analysis Attached? YES _____ NO _____ On file at facility.

Restricted Waste Notification (Category 2)
I notify that I am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is subject to the treatment standards specified in 40 CFR 268, Subpart D. Waste must be treated to the appropriate regulatory treatment standard or, by the appropriate regulatory treatment method.

Corresponding Treatment Standard: SEE ATTACHED FORM B

Treated Waste Notification (Category 5)
(5a) I certify under penalty of law that I have personally examined and am familiar with the treatment 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 prohibitions set forth in 40 CFR 265.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

(5b) 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 support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR part 264, subpart O) or 40 CFR part 265, subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

(5c) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

SIGNATURE: Charley Ferrell III DATE: 6-2-94
PRINT NAME: CHARLEY FERRELL III TITLE: COMPLIANCE MGR

Generator Name/Location: Dana Container 7254 Mt Holly Rd Charlotte NC 28214

EPA ID Number: NCX074505850 Manifest Number:

Waste Profile or ARF	Category #	EPA or State Waste Code	Variance Date	Sub Category	Treatability Group (WW or NW)	40 CFR Ref.	Specific Treatment Technology	Legend #	Other
RVID0101	2	D001		HITOC > 10% TCC	NWW	268.42 Table 2	ROGS INCL FSLUBS		
RVID0101	2	D001		HITOC > 10% TCC	NWW	268.42 Table 2	ROGS INCL FSLUBS		
RVID0103	2	D001		HITOC > 10% TCC	NWW	268.42 Table 2	ROGS INCL FSLUBS		
RVID0103		D011			NWW	268.41 Table C			
RVID0103		D018, D021, D035, D039							
RVID0103		F002, F003, F005	<u>6/6/94</u>		NWW	268.43 Table C		17, 1	
RVID0103		U002, U029, U226			NWW	268.43 Table C			
AU000103	2	F002			NWW	268.43 Table C		6/21	
		F003						1	
		F005						2 + 17	
Residual	2	D002		Non-CWA	NWW	268.42 Table 2	REACT to F003	1/19	

SIGNATURE: Charley Ferrell III TITLE: COMPLIANCE MGR.
 PRINT NAME: CHARLEY FERRELL III DATE: 6-2-94

ONLY ORIGINAL SIGNATURES WILL BE ACCEPTED!

Generator Name/Location: Dana Container 7254 Mt Holly Rd, Charlotte NC 28214

EPA ID Number: NC1074505850

Manifest Number: _____

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
RVIDO 101	2	D001		H ₁ TOC > 10% TOC	NWW	268.42 Table 2	ROGS, INCIN, FSUBS		
RVIDO 102	2	D001		H ₁ TOC > 10% TOC	NWW	268.42 Table 2	ROGS, INCIN, FSUBS		
RVIDO 103	2	D001		H ₁ TOC > 10% TOC	NWW	268.42 Table 2	ROGS, INCIN, FSUBS		
RVIDO 103		D011			NWW	268.41 Table C			
RVIDO103		D008, D021, D035, D038							
RVIDO 103	1	F002, F003, F005			NWW	268.43 Table C		17, 1	
RVIDO 103		U002, U004, U220			NWW	268.43 Table C			

SIGNATURE: Charley Ferrell III

TITLE: Compliance MGR.

PRINT NAME: CHARLEY FERRELL III

DATE: 6-2-94

Only Statements with Original Signatures will be Accepted!

Generator Name/Location: Dana Container 7251 Mill Holly Rd Charlotte NC 28214

EPA I.D. Number: NC 074505850

Waste Profile or ARF Designation: RVD0101 RVD0102 RVD0103

Manifest Number: _____

EPA Hazardous Waste Number(s): D001, D011, D021, D035, D039, F002, F003, F005, U002, U039, U020

Waste Analysis Attached? YES _____ NO _____ On file at facility.

Restricted Waste Notification (Category 2)

I notify that I am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is subject to the treatment standards specified in 40 CFR 268, Subpart D. Waste must be treated to the appropriate regulatory treatment standard or, by the appropriate regulatory treatment method.

Corresponding Treatment Standard: SEE attached Form B

Treated Waste Notification (Category 5)

(5a) I certify under penalty of law that I have personally examined and am familiar with the treatment 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 prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

(5b) 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 support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR part 264, subpart O) or 40 CFR part 265, subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

(5c) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

COPY

SIGNATURE: Charley Ferrell DATE: 6-2-94
PRINT NAME: CHARLEY FERRELL TITLE: COMPLIANCE MGR.

Constituent	*Regulatory Threshold Level	(check one)		Scientific Data	(Check One) Generator's Knowledge	Act Va
		Yes	No			
D031 Heptachlor (and its hydroxide)	0.008	—	✓	—	✓	—
D032 Hexachlorobenzene	0.13	—	✓	—	✓	—
D033 Hexachloro- butadiene	0.5	—	✓	—	✓	—
D034 Hexachloroethane	3.0	—	✓	—	✓	—
D035 Methyl ethyl ketone	200.0	—	✓	—	✓	—
D036 Nitrobenzene	2.0	—	✓	—	✓	—
D037 Penta- chlorophenol	100.0	—	✓	—	✓	—
D038 Pyridine	5.0	—	✓	—	✓	—
D039 Tetra- chloroethylene	0.7	—	✓	—	✓	—
D040 Trichlorethylene	0.5	—	✓	—	✓	—
D041 2,4,5- Trichlorophenol	400.0	—	✓	—	✓	—
D042 2,4,6- Trichlorophenol	2.0	—	✓	—	✓	—
D043 Vinyl Chloride	0.2	—	✓	—	✓	—

*As defined by the TCLP (method 1311), Ep Toxicity is no longer acceptable.

Use of Generator's Knowledge is based upon the following (check one):

- 1) _____ MSDA's (Please Attach)
- 2) _____ Analysis (Please Attach)
- 3) Other (Explain how determined, example: Not present in process producing)

Not present in process producing

"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)

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 fully completed, I authorize Laidlaw Environmental Services to conduct necessary testing at my expense to properly complete the form.

SIGNATURE: Charley Ferrell II DATE: 7-5-94

PRINT NAME: CHARLEY FERRELL II TITLE: TANK WASH MGR



NORTH CAROLINA HAZARDOUS WASTE MANIFEST

Form Approved OMB No. 2050-0038 Expires 12/31/94

Form Approved OMB No. 2050-0038 Expires 12/31/94

FORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D 0 7 4 5 0 5 8 5 0 9 9 0 0 2		2. Page 1 of 1		Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address Dana Container 7254 Mt. Holly Road Charlotte, NC 28214				A. State Manifest Document Number		B. State Generator's ID	
4. Generator's Phone (704) 399-3395		6. US EPA ID Number N C D 9 8 0 7 9 9 1 4 2		C. State Transporter's ID NC0980		D. Transporter's Phone 704-399-3395	
5. Transporter 1 Company Name STAT, Inc.				8. US EPA ID Number		E. State Transporter's ID	
7. Transporter 2 Company Name				10. US EPA ID Number		F. Transporter's Phone	
9. Designated Facility Name and Site Address GSX - LADLAW ENVIRONMENTAL SERVICES, (TS), INC. 208 Watlington Industrial Drive Reidsville, NC 27320				12. Containers No. Type		13. Total Quantity	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				14. Unit Wt/Vol		15. Special Handling Instructions and Additional Information	
a. RQ, Waste Flammable Liquid, n.o.s. (contains alpha naphtha), 3, UN-1993, PGIII, (D001)				0102 D M		00010 G	
b. RQ, Waste Flammable Liquid, n.o.s., (contains methyl ethyl ketone & kerosene), 3, UN0193, PGIII, (F002, F003, F005, D001, D011, D018, D021, D035, D039, U002, U039, U220)				0002 D M		00010 G	
c.							
d.							
Description for Materials Listed Above Total weight is 200 lbs. Item A-approval #RVID0102 Total weight of waste is NC Item B-approval #RVID0103 1767				K. Handling Codes for Waste Use guide no. 70			
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, I have made a good faith effort to minimize my waste generation and selected the best waste management method that is available to me and that I can afford.							
Printed/Typed Name CHARLEY FERRELL II		Signature Charley Ferrell II		Month Day Year 10 8 10 94			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name DANNY L. ROARK		Signature Danny L. Roark		Month Day Year 10 8 10 94			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year			
19. Operator's Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Signature							

GENERATOR

35
39
20

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N C D 0 7 4 5 0 5 8 5 0 9 7 0 0 2		2. Page 1 of 1		Information in the shaded areas is not required by Federal law				
3. Generator's Name and Mailing Address Dana Container 7254 Mt. Holly Road Charlotte, NC 28214				A. State Manifest Document Number						
4. Generator's Phone (704) 399-3395				B. State Generator's ID						
5. Transporter 1 Company Name STAT, Inc.		6. US EPA ID Number N C D 9 8 0 7 9 9 1 4 2		C. State Transporter's ID NCD980799142		D. Transporter's Phone 704-396-2304				
7. Transporter 2 Company Name				8. US EPA ID Number						
9. Designated Facility Name and Site Address GSX - LAIDLAW ENVIRONMENTAL SERVICES (TS), INC. 208 Watlington Industrial Drive Reidsville, NC 27320				10. US EPA ID Number N C D 0 0 0 6 4 8 4 5 1						
E. State Transporter's ID				F. Transporter's Phone						
G. State Facility's ID				H. Facility's Phone (919) 342-6106						
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers	13. Total Quantity	14. Unit Wt/Vol	Waste No.	
GENERATOR	a. RQ, Waste Flammable Liquid, n.o.s. (contains alpha naptha), 3, UN-1993, PGIII, (D001)						No. 0102	Type DM	00010	G D001
	b. RQ, Waste Flammable Liquid, n.o.s., (contains methyl ethyl ketone & kerosene), 3, UN-1993, PGIII, (F002, F003, F005, D001, D011, D018, D021, D035, D039, U002, U039, U220)						No. 002	Type DM	00010	G F002, F003, D001, D011, D018, D021, D035, D039, U002, U039, U220
	c.									
	d.									
J. Additional Description for Materials Listed Above Items A&B-RQ is 100 lbs. Item A-approval #RVID0102 State origin of waste is NC Item B-approval #RVID0103 Workorder #1767						K. Handling Codes for Wastes Listed Above Use guide no. 26				
15. Special Handling Instructions and Additional Information In case of fire or spill call STAT, Inc. Contact Garry Sparks at 704-396-2304, After 5:00PM call Garry at 1-800-627-1451. 24 hr. emergency #1-800-424-9300 (CHEMTREC)										
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, 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.										
Printed/Typed Name CHARLEY FERRELL II				Signature Charley Ferrell II				Month Day Year 10 8 10 1994		
TRANSPORTER	17. Transporter 1 Acknowledgement of Receipt of Materials						Signature Danny L. Roark			
	Printed/Typed Name DANNY L. ROARK				Month Day Year 10 8 10 1994					
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature				
Printed/Typed Name						Month Day Year				
FACILITY	19. Discrepancy Indication Space Line a should read Hazardous Waste Solid, NOS (alpha naphtha), 9, NA 3077, PGIII " b " " RQ Hazardous Waste Solid, NOS (methyl ethyl ketone, kerosene), 9, NA 3077, PGIII Line Ia add D002									
	Printed/Typed Name Donnie Struder				Signature Donnie Struder				Month Day Year 10 8 11 1994	



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

PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter) Form Approved. OMB No. 2050-0039 Expires 9-30-91

25509

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No. **NC D074303850** Manifest Document No. **94004**

2. Page 1 of 1 Information in the shaded areas is not required by Federal law, but is by State law.

3. Generator's Name and Mailing Address DANA CORPORATION 7254 MT. HOLLY ROAD CHARLOTTE, NC 28214		A. State Manifest Document Number	
4. Generator's Phone (704) 399-3395		B. State Generator's ID	
5. Transporter 1 Company Name STAT, INC.		6. U.S. EPA ID Number NC D980799142	
7. Transporter 2 Company Name		8. U.S. EPA ID Number	
9. Designated Facility Name and Site Address SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD SUMTER, SC 29150		10. U.S. EPA ID Number SC D036275626	
		C. State Transporter's ID NCD980799142	
		D. Transporter's Phone 704-396-2304	
		E. State Transporter's ID	
		F. Transporter's Phone	
		G. State Facility's ID	
		H. Facility's Phone 803-773-1400	

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	1. Waste Number
a. RQ Waste Flammable Liquid, n.o.s., (contains acetone & oil) 3, UN-1993, PG III (F001, F002, F003, D001)	002	110	G	F001 F002 F003 D001
b. RQ Waste Flammable Liquid, n.o.s., (contains acetone & methyl chloride) 3, UN-1993, PG III (F003, F002, D001)	001	55	G	F003 F002 D001
c. RQ Waste Flammable Liquid, n.o.s., (contains formaldehyde) 3, UN-1993, PG III (F003, F005, D001)	001	55	G	F003 F005 D001
d. RCRA & DOT Non-Regulated, Non-Hazardous Material (contains lube waste spent oils)	002	110	G	7777

J. Additional Descriptions for Materials Listed Above

a. **SE 16139 F001**

b. **SE 10140 F003**

c. **SE A2071 6990**

d. **SE 10141 7777**

K. Handling Codes for Wastes Listed Above

Items A-C use guide #32

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)

In case of fire or spill call STAT, Inc. Contact Garry Sparks 70-396-2304. After 5PM call Garry 1-800-627-1451.

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 MSL SW, Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

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 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.

Printed/Typed Name **Gregory A. Matthews** Signature *Gregory A. Matthews* Month Day Year **09/08/94**

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name **DANNY L. ROARK** Signature *Danny L. Roark* Month Day Year **09/08/94**

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name _____ Signature _____ Month Day Year _____

19. Discrepancy Indication Space

a. **769** lbs. c. **481** lbs.
b. **158** lbs. d. **916** lbs.

20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name **J.D. ALVARADO** Signature *J.D. Alvarado* Month Day Year **09/08/94**

GENERATOR

TRANSPORTER

FACILITY



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

PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N C D 0 7 4 5 0 5 8 5 0	Manifest Document No. 4	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address DANA CORPORATION 7254 MT. HOLLY ROAD CHARLOTTE, NC 28214		A. State Manifest Document Number		B. State Generator's ID		
4. Generator's Phone (704) 399-3395		C. State Transporter's ID NCD980799142		D. Transporter's Phone 704-396-2304		
5. Transporter 1 Company Name STAT, INC.		6. U.S. EPA ID Number N C D 9 8 0 7 9 9 1 4 2		E. State Transporter's ID		
7. Transporter 2 Company Name		8. U.S. EPA ID Number		F. Transporter's Phone		
9. Designated Facility Name and Site Address SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD SUMTER, SC 29150		10. U.S. EPA ID Number S C D 0 3 6 2 7 5 6 2 6		G. State Facility's ID		
H. Facility's Phone 803-773-1400						
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste Number	
a. RQ. Waste Flammable Liquid, n.o.s., (contains acetone & oil) 3, UN-1993, PG III (F001, F002, F003, D001)		002	DM	110	G	F001 F002 F003 D001
b. RQ. Waste Flammable Liquid, n.o.s., (contains acetone & methyl chloride) 3, UN-1993, PG III (F003, F002, D001)		001	DM	55	G	F003 F002 D001
c. RQ. Waste Flammable Liquid, n.o.s., (contains formaldehyde) 3, UN-1993, PG III (F003, F005, D001)		001	DM	55	G	F003 F005 D001
d. RCRA & DOT Non-Regulated, Non-Hazardous Material (contains lube waste spent oils)		002	DM	110	G	7777
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above		Items A-C use guide #328		
a. S E - 6 - 9 - 9 - F 0 0 1		c. S E - A 2 0 7 1 - 6 9 9 0				
b. S E - 1 0 1 4 0 - F 0 0 3		d. S E - 1 6 1 4 1 - 7 7 7 7				
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)		In case of fire or spill STAT, Inc Contact Garry Sparks 70-396-2304. After 5PM call Garry 1-800-627-1451.		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. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.		
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 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.						
Printed/Typed Name Gregory A. Matthews		Signature Gregory A. Matthews		Month Day Year 10 9 89		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name DANNY L. ROARK		Signature Danny L. Roark		Month Day Year 10 9 89		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
		a [] lbs.		c [] lbs.		
		b [] lbs.		d [] lbs.		
20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		

GENERATOR

TRANSPORTER

FACILITY



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

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N C D 0 7 4 5 0 3 8 5 0	Manifest Document No. 0 0 0 0 0 0 0 0 0 0	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address DANA CORPORATION 7254 MT. HOLLY ROAD CHARLOTTE, NC 28214			A. State Manifest Document Number			
4. Generator's Phone 704 399-3395			B. State Generator's ID			
5. Transporter 1 Company Name STAT, INC		6. U.S. EPA ID Number N C D 9 8 0 7 9 9 1 4 2		C. State Transporter's ID NCD980799142		
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone 704-396-2304		
9. Designated Facility Name and Site Address SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD SUMNER, SC 29150		10. U.S. EPA ID Number S C D 0 3 6 2 7 5 6 2 6		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 803-773-1400		
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No.	Type	13. Total Quantity	14. Unit W/Vol
a. RQ Waste Flammable Liquid, n.o.s., (contains acetone & oil) 3, UN-1993, PG-III (F001, F002, F003, D001)			002	DM	110	G
b. RQ Waste Flammable Liquid, n.o.s., (contains acetone & methyl chloride) 3, UN-1993, PG-III (F003, F002, D001)			001	DM	55	G
c. RQ Waste Flammable Liquid, n.o.s., (contains formaldehyde) 3, UN-1993, PG-III (F003, F005, D001)			001	DM	55	G
d. RCRA & DOT Non-Regulated, Non-Hazardous Material (contains lube waste spent oils)			002	DM	110	G
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)			In case of fire or spill STAT, Inc Contact Garry Sparks 70-396-2304. After 5PM call Garry 1-800-627-1451.		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. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.	
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17. Transporter 1 Acknowledgement of Receipt of Materials			a. S E A 2 0 7 1 6 9 9 0 S E 1 0 1 4 0 F 0 0 3			
18. Transporter 2 Acknowledgement of Receipt of Materials			b. S E 1 0 1 4 0 F 0 0 3			
19. Discrepancy Indication Space			c. S E 1 0 1 4 0 F 0 0 3			
20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.			d. S E 1 0 1 4 0 F 0 0 3			

GENERATOR

TRANSPORTER

FACILITY

Printed/Typed Name: Gregory A. Matthews Signature: Gregory A. Matthews Month Day Year: 10 9 08 94

Printed/Typed Name: DANNY L. ROARK Signature: Danny L. Roark Month Day Year: 10 9 08 94

Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

19. Discrepancy Indication Space
a. _____ lbs. c. _____ lbs.
b. _____ lbs. d. _____ lbs.

20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

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

N-112

PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No. **NC D 0 7 4 5 0 5 8 5 0** Manifest Document No. **003**

2. Page **1** of **1** Information in the shaded areas is not required by Federal law, but is by State law

3. Generator's Name and Mailing Address
**DANA CONTAINER
7254 MT. HOLLY ROAD
CHARLOTTE, NC 28214**

A. State Manifest Document Number

4. Generator's Phone **704 999-3995**

B. State Generator's ID

5. Transporter's Company Name **STAT, INC.** 6. U.S. EPA ID Number **NC D 9 8 0 7 9 9 1 4 2**

C. State Transporter's ID **NCD980799142**

D. Transporter's Phone **704-396-2904**

7. Transporter's Company Name

E. State Transporter's ID

F. Transporter's Phone

8. U.S. EPA ID Number

G. State Facility's ID

9. Disposal Facility Name and Site Address
**SOUTHEASTERN CHEMICAL AND SOLVENT
755 INDUSTRIAL ROAD
SUMMER, SC 29150**

H. Facility's Phone **803-773-1400**

10. U.S. EPA ID Number **SC D 0 3 6 2 7 5 6 2 6**

11. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit W/Vol.	15. Waste Number
	No.	Type			
DOT: Non-Regulated, Non-Hazardous Material (contains waste spent oils)	001	DM	00045	G	7 7 7 7

16. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

a. <input type="checkbox"/>	b. <input type="checkbox"/>	c. <input type="checkbox"/>	d. <input type="checkbox"/>
-----------------------------	-----------------------------	-----------------------------	-----------------------------

15. Special Handling Instructions and Additional Information
State origin of waste is NC
Work order #1953
24 hr emergency #1-800-424-9900 (CHEMTREC)
In case of fire or spill call STAT, Inc. Contact Garry Sparks 704-996-2904. After 5PM call Garry 1-800-627-1431.

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. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

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17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name **CHARLEY FERRELL III** Signature **Charley Ferrell III** Month Day Year **052495**

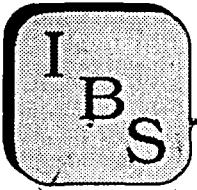
18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name **DANNY ROARK** Signature **Danny Roark** Month Day Year **052495**

19. Discrepancy Indication Space
a. lbs. c. lbs.
b. lbs. d. lbs.

20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name Signature Month Day Year

EPA Form 7



Industrial Brokerage Services, Inc.
 P. O. Box 1263 / Lenoir, North Carolina 28645

INVOICE NUMBER	10011000
INVOICE DATE	11/12/94

SOLD TO

SHIPPED TO

DATA CONTAINED
 HEREIN IS UNCLASSIFIED
 DATE 11/12/94 BY 10011000

TERMS	CUSTOMER ORDER NO.	CUSTOMER NO.	SALESPERSON	SHIPPED VIA	F.O.B.	DATE SHIPPED
NET 30						11/12/94

QUANTITY	UNIT	ITEM #	DESCRIPTION	UNIT PRICE	AMOUNT
2	SOAL	
2	SOAL	
2		
1		
1		

*Please
 Pay @ 60 day
 mark. Thanks
 Approved
 11/12/94*

TOTAL AMOUNT	885.00
--------------	--------

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 June 6, 1994, we received a waste shipment under Manifest Number 94003, and the following discrepancies were noted for which corrective actions are required.

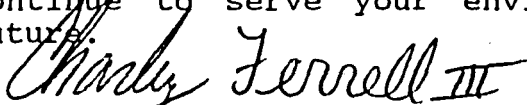
LINE C BLOCK I SHOULD INCLUDE WASTE NUMBER "U239" INSTEAD OF "U039".

LINE 11B SHOULD READ, "(RQ)WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S., 3, UN2924, PG III (D001)RQ (ALPHA NAPHTHA)"

BLOCK I SHOULD HAVE "D002" AS THE WASTE NUMBER INSTEAD OF "D001" REFERENCE RVIDO-104"

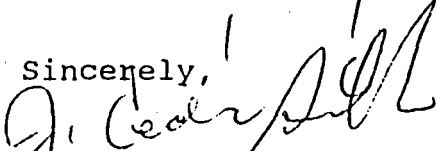
The discrepancies and the corrective action have been noted on the manifest under Sections 19 (Discrepancy Indication Space). Your signature below constitutes approval of the above noted corrective action. Please keep one copy for your records and return the signed original to us. In addition the Customer 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

Sincerely,



James Cedric Smith
MATERIAL ROUTER

UP TO 210 LITERS of OIL 200n

AWAY!

drum log (correct)

drum start date _____

9-8-93 DRUM number IL 00002

Ship by _____

6-8-94

DENATURED ALCOHOL

(DANA) 20 gallons

MOTOR OIL

(HOT-Z TRAWS) 21 gallons

~~total gallons~~

total gallons _____

1. check for MANIFESTED WASTE.
2. if so attach a copy of MANIFEST.
3. check to see if listed waste are on TCLP.

MAJOR CONSTITUANTS, Denatured Alcohol, Motor Oil.

drum log

drum start date

7-28-93

RD 00001

DRUM number

DENATURED ALCOHOL

(DANA)

55 gal.

~~total gallons~~

total gallons 55

1. check for MANIFESTED WASTE.
2. if so attach a copy of MANIFEST.
3. check to see if listed waste are on TCLP.

MAJOR CONSTITUANTS, DENATURED ALCOHOL

1

TC Rule Certification/Recertification Form

Generator Name: DAWA Container EPA I.D.#: NC0074505850
 Location: 7254 Mt. Holly Rd Charlotte, NC 28214
 Waste Description: Tank Cleanup

CHARACTERISTICS OF HAZARDOUS WASTE: Indicate if this waste contains any of the following characteristics based on criteria mandated by 40 CFR 261.21, 261.22, 261.23 and 261.24.

	Regulatory Threshold Level	(Check One)		Scientific Data	(Check One) Generator's Knowledge	Actual Value
		Yes	No			
DOO1	Characteristic of Ignitability < 140°F		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DOO2	Characteristic of Corrosivity ≤ 2 or ≥ 12.5		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DOO3	Characteristic of Reactivity		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
	*Regulatory Threshold Level, ppm	(Check One)		Scientific Data	(Check One) Generator's Knowledge	Actual Value (ppm)
Constituent		Yes	No			
DOO4	(Arsenic) 5.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DOO5	(Barium) 100.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DOO6	(Cadmium) 1.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DOO7	(Chromium) 5.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DOO8	(Lead) 5.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DOO9	(Mercury) 0.2		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO10	(Selenium) 1.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO11	(Silver) 5.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO12	Edrin 0.02		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO13	Lindane 0.4		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO14	Methoxychlor 10.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO15	Toxaphene 0.5		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO16	2,4-D 10.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
	(2,4-Dichloro-phenoxyacetic acid.)		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO17	2,4,5-TP Silvex 1.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO18	Benzene 0.5		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO19	Carbon Tetrachloride 0.5		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO20	Chlordane 0.03		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO21	Chlorobenzene 100.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO22	Chloroform 6.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO23	o-Cresol 200.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO24	m-Cresol 200.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
DO25	p-Cresol 200.0		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	

Constituent	Regulatory Threshold Level, ppm	(Check One)		(Check One)		Actual Value (ppm)
		Yes	No	Scientific Data	Generator's Knowledge	
DO26 Cresol	200.0		✓		✓	
DO27 1,4-Dichlorobenzene	7.5		✓		✓	
DO28 1,2-Dichloroethane	0.5		✓		✓	
DO29 1,1-Dichloroethylene	0.7		✓		✓	
DO30 2,4-Dinitrotoluene	0.13		✓		✓	
DO31 Heptachlor (and its epoxide)	0.008		✓		✓	
DO32 Hexachlorobenzene	0.13		✓		✓	
DO33 Hexachlorobutadiene	0.5		✓		✓	
DO34 Hexachloroethane	3.0		✓		✓	
DO35 Methyl ethyl ketone	200.0		✓		✓	
DO36 Nitrobenzene	2.0		✓		✓	
DO37 Perchlorophenol	100.0		✓		✓	
DO38 Pyridine	5.0		✓		✓	
DO39 Tetrachlorethylene	0.7		✓		✓	
DO40 Trichlorethylene	0.5		✓		✓	
DO41 2,4,5-Trichlorophenol	400.0		✓		✓	
DO42 2,4,6-Trichlorophenol	2.0		✓		✓	
DO43 Vinyl Chloride	0.2		✓		✓	

Waste Oil Rebuttal: This waste oil has not been mixed with any hazardous waste

Signature: Charley Ferrell III Date: 8-1-94

(Ref: R.61-79.266 Subpart F, SC Regs)

"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 hazardous waste code(s).

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 fully completed, I authorize Southeastern Chemical Co. to conduct necessary testing at my expense to properly complete the form.

Signature: Charley Ferrell III Date: 8-1-94

Print Name: CHARLEY FERRELL III Title: 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 Dana Container

ADDRESS 7254 Mt Holly Road

CITY Charlotte STATE NC ZIP 28214

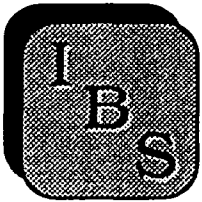
EPA ID NO. NC0074505850 EPA WASTE NO. F003, F005, D001

ACCUMULATION START DATE _____ MANIFEST DOCUMENT NO. _____

[RQ, Waste Flammable Liquid, n.o.s.
(contains formaldehyde) 3, UN-1993,
PGIII]
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

IS 00001



Industrial Brokerage Services, Inc.

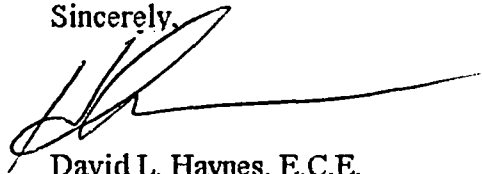
July 27, 1994

Mr. Chuck Ferrell
DANA CONTAINER
7254 Mt. Holly Road
Charlotte, NC 28214

Dear Chuck:

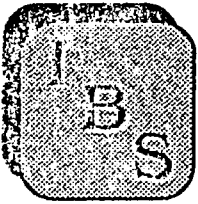
As per our conversation of July 26th, I am following through on the disposal of your formaldehyde. I have contacted Southeastern Chemical Co. (OMNI) and they have informed me that they have no record of the Authorization Request Forms being signed or submitted. I am resubmitting the forms back to you 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, Tetrahydrofuran 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 RUSH APPROVAL ON THIS.



Sample Information Sheet

Sample to be Considered:
 R&R Fuels

Contact Chuck Ferrell Phone (704) 399-3395
Customer Name Dana Container
Address 7254 Mt. Holly Rd
City Charlotte State NC Zip 28214

Date _____
Code _____
SEC Sample I.D. # _____
EPA I.D. # NCID 074505850

Sample Description Brown liquid/sludge

Sample Collected By _____

Process Generating This Sample Tanker Clean out

CONTENTS (Attach MSDS or Information if possible)

- ① Formaldehyde
- ② Solvents
 methyl ethyl ketone
 Toluene
- ③ Waste Gasoline
- ④ Petroleum Oil

GENERAL CHARACTERISTICS

Color Brown Liquid
 Odor _____ Sludge
 Mild Solid
 Strong Powder
 None

HAZARDS (List any known or potential hazards associated with this sample)

Flammable

ANTICIPATED VOLUME

_____ Gals. Bulk
1-3 Drums
 One Time Month
 Week Year
 Other 3-6 months

Log-In Date _____ % Recovery _____
 Sample Volume Received _____ BTU > 5,000
 Chlorine < 100 ppm

	% H ₂ O	PH	SPG	Color	Physical Description
ASIS	0-5	5-7	.99	Brown	Brown Sludge
DIST					

I.D.	%	I.D.	%	CLASS
①	30-37			F003
②	30-36			F005
③	15-18			D001
④	5-9			

Results & Comments Please send all bills & correspondence to:

IBS, INC.
P. O. BOX 1263
LENOIR NC 28645

Signed Charley Ferrell Date 8-1-94

TC Rule Certification/Recertification Form

Generator Name: Dana Container EPA I.D. #: NCDO74505850
 Location: 7254 Mt Holly Rd, Charlotte NC 28214
 Waste Description: Brown Liquid - Sludge

CHARACTERISTICS OF HAZARDOUS WASTE: Indicate if this waste contains any of the following characteristics based on criteria mandated by 40 CFR 261.21, 261.22, 261.23 and 261.24.

	Regulatory Threshold Level	(Check One)		(Check One)		Actual Value
		Yes	No	Scientific Data	Generator's Knowledge	
DO01	Characteristic of Ignitability < 140°F	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	°F
DO02	Characteristic of Corrosivity ≤ 2 or ≥ 12.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	pH
DO03	Characteristic of Reactivity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Constituent	*Regulatory Threshold Level, ppm	(Check One)		(Check One)		Actual Value (ppm)
		Yes	No	Scientific Data	Generator's Knowledge	
DO04	(Arsenic) 5.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO05	(Barium) 100.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO06	(Cadmium) 1.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO07	(Chromium) 5.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO08	(Lead) 5.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO09	(Mercury) 0.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO10	(Selenium) 1.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO11	(Silver) 5.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO12	Edrin 0.02	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO13	Lindane 0.4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO14	Methoxychlor 10.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO15	Toxaphene 0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO16	2,4-D (2,4-Dichloro-phenoxyacetic acid) 10.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO17	2,4,5-TP Silvex 1.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO18	Benzene 0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO19	Carbon Tetrachloride 0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO20	Chlordane 0.03	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO21	Chlorobenzene 100.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO22	Chloroform 6.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO23	o-Cresol 200.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO24	m-Cresol 200.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DO25	p-Cresol 200.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Constituent	*Regulatory Threshold Level, ppm	(Check One)		(Check One)		Actual Value (ppm)
		Yes	No	Scientific Data	Generator's Knowledge	
DO26 Cresol	200.0		✓		✓	
DO27 1,4-Dichlorobenzene	7.5		✓		✓	
DO28 1,2-Dichlorobenzene	0.5		✓		✓	
DO29 1,1-Dichlorobenzene	0.7		✓		✓	
DO30 2,4-Dinitrotoluene	0.13		✓		✓	
DO31 Heptachlor (and its hydroxide)	0.008		✓		✓	
DO32 Hexachlorobenzene	0.13		✓		✓	
DO33 Hexachlorobutadiene	0.5		✓		✓	
DO34 Hexachloroethane	3.0		✓		✓	
DO35 Methyl ethyl ketone	200.0		✓		✓	
DO36 Nitrobenzene	2.0		✓		✓	
DO37 Pentachlorophenol	100.0		✓		✓	
DO38 Pyridine	5.0		✓		✓	
DO39 Tetrachlorethylene	0.7		✓		✓	
DO40 Trichlorethylene	0.5		✓		✓	
DO41 2,4,5-Trichlorophenol	400.0		✓		✓	
DO42 2,4,6-Trichlorophenol	2.0		✓		✓	
DO43 Vinyl Chloride	0.2		✓		✓	

*As defined by the TCLP (Method 1311), EP Toxicity is no longer acceptable.

"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 _____ _____ _____ _____

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 fully completed, I authorize Southeastern Chemical Co. to conduct necessary testing at my expense to properly complete the form.

Signature: Charley Ferrell II Date: 8-1-94
 Print Name: CHARLEY FERRELL II Title: TANK WASH MGR.

THIS CERTIFICATION/RECERTIFICATION IS REQUIRED FOR EACH PROFILE.
 ORIGINAL SIGNATURE REQUIRED

Authorization Request Form

South Carolina Department of Health and Environmental Control
Bureau of Solid and Hazardous Waste
(803) 734-5200

- Landfill
- Recycle
- Landfarm
- Other
- Reclaim
- Incinerate
- Energy/Recovery

Authorization Number: [] [] [] [] [] [] [] [] [] []

To be entered
by TSD Facility

Generator Information:

Generator ID # NCSD074505850 Name Dana Container

Address 7254 Mt Holly Road City CHARLOTTE State Nc Zip Code 28214

Official Contact Chuck Ferrell Title supervisor Telephone 704-399-3395

Area Code SC County (For In-state Generator Only)

Treatment, Storage, or Disposal Facility Information:

Facility EPA IUD # SCD036275626 Name: **SOUTHEASTERN CHEMICAL & SOLVENT COMPANY**
755 Industrial Road • P.O. Drawer 1060
Sumter, SC 29151

[] Line # (This line # will always represent this specific waste stream)

BROWN LIQUID SLUDGE

Description of Hazardous Waste

F003 F005 D001 [] [] [] []
EPA / DHEC Waste Codes

08
DOT
Hazard Class

Process Producing Waste:
Task Cleaning

DOT Code: RD Waste Flammable Liquid n.o.s.
(contains Formaldehyde) 3, UN-1993 PGIII

Enter Quarter for One-Time Disposal: [] / [] 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: S.O.I

Volume: (lbs./yr. only) 1,000 Est.

Flash Point (cc)

1. N/A 2. < 60°F 3. 60-140°F 4. > 140°F

For DHEC Use Only:

Date Received: [] / [] / []
Month Date Year

Notes: _____

Authorization Request Form

(Continued)

Facility Use Only:

Packaging for Shipment: In Drums (size) 55 gal In Bulk Other
 Method of Transportation: Railroad tanker Truck Other: _____ Specific Gravity: .99
 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 % 45
 Thousands of Btu's/lbs. Specify: >5,000 Organically Bound Sulfur (wt. %): 0 Organically Bound Chloride: 0
 Organically Bound Nitrogen (Wt %): 0 Toxicity: High Medium Unknown Ash %: 4
 Affinity for Water: Hydrophilic Lipophilic pH (if hydrophilic): 3-4
 Visual Description of Waste: Brown liquid / sludge

Constituents: List specific constituents by name and corresponding percentage in waste stream.

Volatile Organics	%	Non-Volatile Organics	%	Acid or Alkalis	%	Salts & Inorganics	%
Solvents:	30-36	Formaldehyde	30-37				
Methyl Ethyl Ketone		Petroleum Oil	5-9				
(Toluene)							
Gasoline	5-18						

Water: 05 %

Authorization Request Form

(Continued)

Metallics (total metals not EP Toxicity Test)

Toxics

As <u>25.0</u> ppm,	Cr ⁺³ <u>25.0</u> ppm	Ag <u>25.0</u> ppm	Se <u>20.2</u> ppm
Ba <u>21000</u> ppm	Cr ⁺⁶ <u>1</u> ppm	Ni <u>20.2</u> ppm	Sb <u>20.2</u> ppm
Cd <u>21.0</u> ppm	Hg <u>20.2</u> ppm	Cu <u>20.2</u> ppm	Mn <u>20.2</u> ppm
Pb <u>25.0</u> ppm	Se <u>21.0</u> ppm	Tl <u>20.2</u> ppm	Co <u>20.2</u> ppm
Zn <u>20.2</u> ppm	_____ ppm	_____ ppm	_____ ppm

Cyanide <u>250</u> ppm
Pesticides <u>250</u> ppm
Carcinogens <u>250</u> ppm
Other Toxics <u>none</u> 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, 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.

Signature: Charley Ferrell III Date Submitted: 8-1-94
Print Name: CHARLEY FERRELL III Title: 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 TSD Facility's standard terms and conditions.

Signature: _____ Date Submitted: _____
Print Name: _____ Title: _____

MATERIAL SAFETY DATA SHEET

GENIUM PUBLISHING CORPORATION
 1145 CATALYN STREET
 SCHENECTADY, NY 12303-1836 USA
 (518) 377-8855



No. 390

FORMAMIDE

Date September 1978

SECTION I. MATERIAL IDENTIFICATION		
MATERIAL NAME: FORMAMIDE OTHER DESIGNATIONS: Methanamide, HCONH ₂ , CAS# 000 075 127 MANUFACTURER: E.I. duPont de Nemours & Co., Inc. Wilmington, DE 19898 Telephone: (302) 774-7500		
SECTION II. INGREDIENTS AND HAZARDS		HAZARD DATA
Formamide	ca 100	B-hr TWA 20 ppm*
Ammonia	Traces	B-hr TWA 50 ppm
* ACGIH (1977) TLV.		Rat, oral LD ₅₀ 7500 mg/kg
SECTION III. PHYSICAL DATA		
Boiling point at 1 atm, deg C ----- 210.5 (partially decomposes above 180 C)		Specific gravity, 20/4 C ----- 1.13
Vapor pressure, mm Hg, at 70.5 C ---- 1.0 at room temp. ----- 0.02		Evaporation rate (BuAc=1) ----- <1
Vapor density (Air=1) ----- 1.55		Melting point, deg C ----- 2.55
Water solubility ----- Complete		Molecular weight ----- 45.04
Appearance & Odor: A clear, colorless, hygroscopic liquid which is moderately viscous at room temperature. It may have a faint odor of ammonia.		
SECTION IV. FIRE AND EXPLOSION DATA		LOWER UPPER
Flash Point and Method	Autoignition Temp.	Flammability Limits In Air
310 F (COC)		
Extinguishing media: "Alcohol" foam and water This combustible material is a moderate fire hazard when heated. It has no unusual fire or explosion hazards. Firefighters should use self-contained breathing apparatus when fighting fires involving formamide.		
SECTION V. REACTIVITY DATA		
Formamide is a stable material in suitable closed containers at room temperature. It undergoes thermal decomposition to carbon monoxide and ammonia beginning at about 180 C. Copper and brass are attacked by formamide. It becomes discolored in contact with mild steel. Aluminum or stainless steel containers should be used for shipping or storage. Formamide will pick up moisture from the atmosphere.		

SECTION VI. HEALTH HAZARD INFORMATION

TLV 20 ppm or 30 mg/m³

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.

Inhalation: 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 TLV 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, CRD

Industrial Hygiene and Safety

Corporate Medical Staff

MANIFEST
ENERGY RECOVERY RESOURCES, INC.

MANIFEST NUMBER

PART I — TO BE COMPLETED BY GENERATOR

COMPANY NAME
Dada Transportation

BUSINESS ADDRESS

ADDRESS WHERE SHIPMENT ORIGINATES

EPA IDENTIFICATION NUMBER												

FACILITY PHONE NUMBER
 ()

PART II — WORK CONTRACTED BY

CONTRACTOR NAME

ADDRESS

RECEIVER'S NAME
ENERGY RECOVERY RESOURCES, INC.

BUSINESS ADDRESS
P.O. Box 5651 Zip 28225

DESTINATION (SITE) ADDRESS
210 Dalton Avenue

Charlotte, N.C.

EPA IDENTIFICATION NUMBER												
N	C	D	0	4	8	4	6	1	3	7	0	

FACILITY PHONE NUMBER
 (704) 332-8692

WASTE DESCRIPTION

NO. CONT. (1)	TYPE CONT. (2)	DOT PROPER SHIPPING NAME (3)	DESCRIPTION (4)	CLASS (5)	AMOUNT (6)	UNITS (7)
	TT	USED OIL			410 gal	

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE EPA.

SIGNATURE OF AUTHORIZED REPRESENTATIVE
Jay Johnson

DATE OF SHIPMENT MO / DAY / YEAR

PART III — TO BE COMPLETED BY TRANSPORTER

TRANSPORTER NAME
Energy Recovery Resources, Inc.

ADDRESS
P.O. Box 5651, Charlotte, NC 28225

PHONE NUMBER
(704) 332-8692

EPA IDENTIFICATION NUMBER												
N	C	D	0	4	8	4	6	1	3	7	0	

This manifest form does not, in any way, replace the national uniform hazardous waste manifest, which must be used if the transported waste is a hazardous waste.

SIGNATURE OF AUTHORIZED AGENT
[Signature]

DATE MO / DAY / YEAR
 4 / 17 / 82

PART IV — FINAL DESTINATION

Energy Recovery Resources, Inc.

The waste oils are treated in a reclamation system and processed into a fuel product.
 The wastewater is processed through a treatment system and discharged into the local sanitary sewer.

1100011

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 FLAMMABLE WASTE LIQUID UN OR NA NO. 1993

GENERATOR INFORMATION

NAME DANA CONTAMER
ADDRESS 7254 MT. HOLLY RD PHONE (704) 399-3395
CITY CHARLOTTE STATE NC ZIP 28214

EPA ID. NO. NCD074505850 EPA WASTE NO. DCB1

ACCUMULATION START DATE 3/23/94 MANIFEST DOCUMENT NO. _____

CONTAINS HAZARDOUS OR TOXIC WASTES

PROPER SHIPPING NAME _____

TECHNICAL CHEMICAL NAME _____

UN OR NA ID. NO. UN 1993

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

~~Heritage~~

Clean Harbor

LAWA

CONTAINER LOG

PAGE OF

LOCATION: CHARLOTTE, NC

DOT SHIPPING NAME: _____

TWO MAIN CONSTITUENTS: _____ & _____

NON-HAZARDOUS HAZARDOUS D001 TCLP LISTED WASTE

ACCUMULATION START DATE: _____

CONTAINER NUMBER: _____

<u>DATE</u>	<u>WORK ORDER #</u>	<u>PRODUCT</u>	<u>PH</u>	<u>GALONS</u>

OVER →

COMMENTS: _____

Industrial Brokerage
Charles Foushee
1-704-396-2308

omni 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 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.

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
803-773-1400

PO Box 1060
FAX: 803-775-7016

Sumter, SC 29151
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 Dana Container

ADDRESS 7254 Mt Holly Road

CITY Charlotte STATE NC ZIP 28214

EPA ID NO. NC0074505850 EPA WASTE NO. F003, F005, D001

ACCUMULATION START DATE _____ MANIFEST DOCUMENT NO. _____

[RQ, Waste Flammable Liquid, n.o.s.
(contains formaldehyde) 3, UN-1993,
PGIII]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

IS 00001

omni the total solution.

Dana Container
7254 Mt Holly Road
Charlotte NC 28214

August 11, 1994

Dear Chuck Ferrell:

RE: Hazardous Waste Stream No.
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 transportation and treatment of the above mentioned hazardous waste generated by your facility. Please note this waste requires special handling.

I. PACKAGING

A. 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.
2. There shall be no holes or serious dents.
3. Plastic, poly-lined or fiber drums 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 must be stenciled on the lid as well as on the containers with minimum 1" letters/numbers.
 2. 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.
 4. Each drum must have all old labels removed. Any stenciling or other extraneous markings that could be conflicting or distracting must be painted or covered over completely.
 5. Southeastern Chemical & Solvent Company should be notified 10 days prion to shipment.

B. MARKING LABELING

1. 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 liquid, sludge or solid.

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

Amendment

New

Authorization Request Form

South Carolina Department of Health and Environmental Control
Bureau of Solid and Hazardous Waste

Landfill

Reclaim

Recycle

Incinerate

Landfarm

Energy/Recovery

Other

RECEIVED AUG 09 1994

(P) (803) 734-5200

20071

JB

Authorization Number: SE - A.2071 - 6990

To be entered by TSD Facility

135

Generator Information:

Generator ID # NCSD074505850 Name Dana Container

Address 7254 Mt Holly Road City CHARLOTTE State NC Zip Code 28214

Official Contact Chuck Ferrell Title supervisor Telephone 704-399-3395
Area Code

SC County (For In-state Generator Only)

Treatment, Storage, or Disposal Facility Information:

Facility EPA IUD # SCDO36275626

Name: **SOUTHEASTERN CHEMICAL & SOLVENT COMPANY**
755 Industrial Road • P.O. Drawer 1060
Sumter, SC 29151

Line # (This line # will always represent this specific waste stream)

BROWN LIQUID SLUDGE

Description of Hazardous Waste

F003 F005 D001
EPA / DHEC Waste Codes

08
DOT
Hazard Class

Process Producing Waste:

Task Cleaning

DOT Code: RQ Waste Flammable Liquid n.o.s.
(contains Formaldehyde) 3, UN-1993, PGIII

Enter Quarter for One-Time Disposal: 1 Qtr./Yr.

Handling Method: S.O.I

If Multiple Shipments Enter Frequency Here: 1 times/yr.

Volume: (lbs. nyr. only) 1,000 Est.

Physical State of Waste @ 70°F

1. solid 2. liquid 3. N/A

Flash Point (cc)

1. N/A 2. < 60°F 3. 60-140°F 4. > 140°F

For DHEC Use Only:

Date Received: / /
Month Date Year

Notes: _____

Authorization Request Form

(Continued)

Facility Use Only:

Packaging for Shipment: In Drums (size) 55 gal In Bulk Other
 Method of Transportation: Railroad tanker Truck Other: Specific Gravity: .99
 Viscosity @ 70° F: Low Medium High Layering: None Dilayered Multilayered
 Suspended Solids: % by weight or volume, Specify exact % 25 Dissolved Solids: by % weight, Specify exact % 25
 Thousands of lbs./lbs. Specify: >5,000 Organically Bound Sulfur (wt. %): 0 Organically Bound Chloride: 0
 Organically Bound Nitrogen (Wt %): 0 Toxicity: High Medium Unknown Ash %: 4
 Affinity for Water: Hydrophilic Lipophilic pH (if hydrophilic): 3-2
 Visual Description of Waste: Brown liquid/sludge

Constituents: List specific constituents by name and corresponding percentage in waste stream.

Volatile Organics	%	Non-Volatile Organics	%	Acid or Alkalis	%	Salts & Inorganics	%
Solvents:	30-36	Formaldehyde	30-37				
Methyl Ethyl Ketone		Petroleum Oil	5-9				
Toluene							
Gasoline	5-18						

Water: 05 %

Authorization Request Form

(Continued)

Allic: (total metals not EP Toxicity Test)

Toxics:

As <u>25.0</u> ppm,	Cr+3 <u>25.0</u> ppm	Ag <u>25.0</u> ppm	Fe <u>20.2</u> ppm
Ba <u>2100.0</u> ppm	Cr+6 <u>1</u> ppm	Ni <u>20.2</u> ppm	Sb <u>20.2</u> ppm
Cd <u>21.0</u> ppm	Hg <u>20.2</u> ppm	Cu <u>20.2</u> ppm	Mn <u>20.2</u> ppm
Pb <u>25.0</u> ppm	Se <u>21.0</u> ppm	Tl <u>20.2</u> ppm	Co <u>20.2</u> ppm
Zn <u>20.2</u> ppm ppm ppm ppm

Cyanide..... <u>250</u> ppm
Pesticides..... <u>250</u> ppm
Carcinogens..... <u>250</u> ppm
Other Toxics <u>none</u> 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, 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.

Signature: Charley Ferrell III Date Submitted: 8-1-94
 Print Name: CHARLEY FERRELL III Title: 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 TSD Facility's standard terms and conditions.

Signature: Donald F. Fitch Date Submitted: 08/08/94
 Print Name: Donald F. Fitch Title: Lab Director

Transport

P.O. BOX 703
NITRO, WV 25143

PHONE # (304) 755-3800
FAX # (304) 755-3992

COVER SHEET

TO:

Lee

FROM:

DATE:

PAGE:

Keep this as record



NCD07450 5850

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

Dana Clay

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 III

R.J. Edwards
Administrative Officer
Waste Management Branch
Hazardous Waste Section

RJE
[FORM1.RJE]

ID: For Official Use

--	--	--	--	--	--	--	--	--	--

VII. Volatile Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions)

A. Hazardous Waste Activity	B. Used Oil Activity
<p>1. Generator (See instructions)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p>3. Burner (Indicate device(s) - Type of Combustion Device)</p> <p>4. Other Marketers</p> <p>5. Other - specify: _____</p>	<p>1. Off-Specification</p> <p>2. Specification Used (of On-Spec Burner)</p> <p>3. Burner - Indicate device(s) - Type of Combustion Device</p> <p>4. Other Marketers</p> <p>5. Underground Injection Control</p>

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonhazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of regulated wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) 2. Corrosive (D002) 3. Reactive (D003) 4. Toxicity Characteristic (D000)

(List specific EPA hazardous waste number(s) for the Characteristic contaminant(s))

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>						
--------------------------	--------------------------	--------------------------	--------------------------	--	--	--	--	--	--

B. Listed Hazardous Wastes (See 40 CFR 261.31-33. See instructions if you need to list more than 12 wastes)

1	2	3	4	5	6	7	8	9	10	11	12

C. Other Wastes (See instructions for equipment I.D. number. See instructions.)

1	2	3	4	5	6	7	8	9	10

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title (type or print)	Date Signed
-----------	---	-------------

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for details.)

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

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. First Notification

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

NC D 07 4 5 0 5 8 5 0

II. Name of Installation (Include company and specific site name)

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

Street (continued)

City or Town

State

ZIP Code

County Code

County Name

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

Job Title

Phone Number (area code and number)

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

Street, P.O. Box, or Route Number

City or Town

State

ZIP Code

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner
Indicator

(Date Changed)
Month Day Year

Yes

No

For Official Use Only

IX. Description of Regulated Hazardous Waste		Quantity (kg or lb)	
B. Listed Hazardous Waste			
13		13	13
14		14	21
15		15	30
16		16	36
17		17	42
18		18	48
19		19	54
20		20	60
21		21	66
22		22	72
23		23	78
24		24	84
25		25	90
26		26	96
27		27	102
28		28	108
29		29	114
30		30	120

Form 1041-1 (1993)
Name of the decedent
Date of death

January 4, 1993

Section 691(b) - Information on the decedent's estate
The decedent was a resident of the United States at the time of death.

Table with 4 columns and 2 rows for marital deduction and charitable deduction.

Table with 4 columns and 2 rows for miscellaneous deductions and total deductions.

Table with 4 columns and 2 rows for adjusted taxable gifts and total taxable gifts.

Section 691(c) - Credit for tax on prior transfers
None

Section 691(d) - Credit for tax on prior transfers
None

Table with 4 columns and 2 rows for total tax and total tax after credits.

Form 1041-1 (1993)
OMB No. 1545-0047

I. Name of Insured (Last, First, Middle Initial)									
II. Name of Insurer (Last, First, Middle Initial)									
III. Location of Installation (Street, P.O. Box, City or Town, State, Zip)									
IV. Installation Name and Address									
V. Description of Property									
VI. Description of Loss									
VII. Description of Cause of Loss									
VIII. Description of Damage									
IX. Description of Other Information									
X. Remarks									

DATE RECEIVED (For Official Use Only)

FORM 100 (Rev. 1-77)

omni

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:

		<u>Attached</u>	<u>Hazard</u>	<u>Hazard</u>
		<u>M.S.D.S.</u>	<u>Class</u>	<u>Rating</u>
_____	_____ %	_____	_____	_____
_____	_____ %	_____	_____	_____
_____	_____ %	_____	_____	_____
_____	_____ %	_____	_____	_____
	100 %			

(5) Attach M.S.D.S.'s of all chemicals listed above in (4).

(6) Please list any suggestions, comments etc. here:

SIGNATURE _____ 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	X	X	X	X				
10/1/91	PIH (1)	X	(2)						
10/1/92	PIH	X	X	X	X	X			
10/1/93	PIH						X	X	
10/1/93	All hazards, except Division 6.2	X	X	X	X			X	
01/1/94	Infectious substances	X	X	X	X		X		
10/1/94	All hazards					X	(3)		
10/1/96	All hazards						X		
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	II

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:

- the Hazardous Material Table, particularly the addition of Columns 5 (Packing Groups and 7 (Special Provisions);
- marking requirements for bulk/non-bulk packages, inhalation hazard, liquid hazardous material;
- labeling requirements, particularly subsidiary hazard labeling and optional label information;
- placarding requirements, except for delayed compliance with newer placard designs;
- shift from DOT specification packaging to a system of performance-oriented packaging;
- segregation/separation chart limits or prohibits hazard combinations based on either the primary or subsidiary hazard, whichever is more restrictive.

over

Industrial Brokerage
Charles Foushee
1-704-396-2308

Omni the total solution.

November 23, 1993

PHONE: 704-399-3395

Dana Container
7254 Mount Holly Road
Charlotte NC 28214

ATTN: Charley Ferrell
FROM: 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 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.

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.

Southeastern Chemical Co. 170 S. Lafayette Blvd. PO Box 1060 Sumter, SC 29151
803-773-1400 FAX: 803-775-7016 Toll Free: 800-872-7002

TCLP + MSDS Attached

Authorization Request Form

Amendment New

South Carolina Department of Health and Environmental Control
Bureau of Solid and Hazardous Waste
(803) 734-5200

Landfill Reclaim
 Recycle Incinerate
 Landfarm Energy/Recovery
 Other _____

RECEIVED OCT 2 1993 (P) 200071

Authorization Number: SEI-14420-F003 ←

To be entered by TSD Facility 1B5

Generator Information:

Generator ID # NC.D074505850 Name DANA CONTAINER

Address 7254 Mt HOLLY ROAD City CHARLOTTE State NC Zip Code 28274

Official Contact CHARLEY FERRELL Title COMPLIANCE MGR. Telephone 704-399-3395
Area Code SC County (For In-state Generator Only)

Treatment, Storage, or Disposal Facility Information:

Facility EPA IUD # S.C.D.O.3.6.2.7.5.6.2.6

Name: SOUTHEASTERN CHEMICAL & SOLVENT COMPANY
755 Industrial Road • P.O. Drawer 1060
Sumter, SC 29151

Line # (This line # will always represent this specific waste stream)

CLEAR LIQUID
Description of Hazardous Waste

F003 D001
EPA / DHEC Waste Codes

D8
DOT Hazard Class

Process Producing Waste:
Tank Cleaning
DOT Code: RQ, Waste Flammable, Liquid, n.o.s., (Contains Ethyl Acetate, Methanol) 3, UN-1993, III

Enter Quarter for One-Time Disposal: 4/93 Qtr./Yr.

Handling Method: S01

If Multiple Shipments Enter Frequency Here: _____ times/yr.

Volume: (lbs./yr. only) 1000

Physical State of Waste @ 70°F

1. solid 2. liquid 3. N/A

Flash Point (cc)

1. N/A 2. < 60°F 3. 60-140°F 4. > 140°F

For DHEC Use Only:

Date Received: _____
Month Date Year

Notes: _____

Authorization Request Form

(Continued)

Facility Use Only:

--	--

Packaging for Shipment: In Drums (size) 55 GAL In Bulk Other

Method of Transportation: Railroad tanker Truck Other: _____ Specific Gravity: 0.8

Viscosity @ 70° F.: Low Medium High Layering: None Dilayered Multilayered

Suspended Solids, % by weight or volume, Specify exact % <1 Dissolved Solids, by % weight, Specify exact % 0

Thousands of lbs./lbs. Specify: 8 TO 10,000 Organically Bound Sulfur (wt. %): <0.1 Organically Bound Chloride: <1

Organically Bound Nitrogen (Wt %): <0.1 Toxicity: High Medium Unknown Ash %: <1

Affinity for Water: Hydrophilic Lipophilic pH (if hydrophilic): 5-7

Visual Description of Waste: CLEAR LIQUID

Constituents: List specific constituents by name and corresponding percentage in waste stream.

Volatile Organics	%	Non-Volatile Organics	%	Acid or Alkalis	%	Salts & Inorganics	%
METHANOL	30-40	PETROLEUM SOLVENT	<5				
DIETHYL ISOBUTYL KETONE	5	HEXYLENE GLYCOL	<5				
ETHYL ACETATE	25-35						
ETHANOL	10-15						

Water: 0-5 %

Authorization Request Form

(Continued)

Metallc: (total metals not EP Toxicity Test)

As <u><5.0</u> ppm	Cr ⁺³ <u><5.0</u> ppm	Ag <u><5.0</u> ppm	Fe <u><0.2</u> ppm
Da <u><100.0</u> ppm	Cr ⁺⁶ _____ ppm	Ni <u><0.2</u> ppm	Sb <u><0.2</u> ppm
Cd <u><1.0</u> ppm	Hg <u><0.2</u> ppm	Cu <u><0.2</u> ppm	Mn <u><0.2</u> ppm
Pb <u><5.0</u> ppm	Se <u><1.0</u> ppm	Tl <u><0.2</u> ppm	Co <u><0.2</u> ppm
Zn <u><0.2</u> ppm	_____ ppm	_____ ppm	_____ ppm

Toxics:

Cyanide <u><50</u> ppm
Pesticides <u><50</u> ppm
Carcinogens <u><50</u> ppm
Other Toxics <u>NONE</u> 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.

Signature: Charley Ferrell II Date Submitted: 10/25/93
 Print Name: CHARLEY FERRELL II Title: Compliance 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 TSD Facility's standard terms and conditions.

Signature: Donald F. Fitch Date Submitted: 11/01/93
 Print Name: DONALD F. FITCH Title: Lab Director

omni the total solution

Industrial Brokerage
1-704-396-2308
Charles Foushee

June 13, 1994

PHONE: 704-399-3395

Dana Container
7254 Mt Holly Road
Charlotte NC 28214

ATTN: Chuck Ferrell
FROM: [REDACTED]

Nancy 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.

Authorization Request Form

South Carolina Department of Health and Environmental Control
Bureau of Solid and Hazardous Waste

(803) 734-5200

- Landfill
- Reclaim
- Recycle
- Incinerate
- Landform
- Energy/Recovery
- Other _____

Amendment New

RECEIVED MAY 5 1991 (P)

TALP-Attached 2/20/91

Wm

Authorization Number: SE - 116,141 : 17777 ←

To be entered by TSD Facility

1/35

Generator Information:

Generator ID # NC D074505850 Name DANA CONTAINER

Address 7254 Mt. HOLLY ROAD City CHARLOTTE State NC Zip Code 28214

Official Contact Chuck Ferrell Title Compliance Mgr. Telephone 704-399-1339 Area Code _____ SC County (For In-state Generator Only) _____

Treatment, Storage, or Disposal Facility Information:

Facility EPA IUD # SC D036275626

Name: **SOUTHEASTERN CHEMICAL & SOLVENT COMPANY**
755 Industrial Road • P.O. Drawer 1060
Sumter, SC 29151

Line # (This line # will always represent this specific waste stream)

NON-HAZARDOUS MATERIAL - DARK BROWN OIL

Description of Hazardous Waste

Process Producing Waste: Tank Cleanout

DOT Code: RCRA 9 DOT Non-Regulated, Non-Hazardous Material (Substrate, Spent Oils)

7777 _____
EPA / DHEC Waste Codes

01
DOT Hazard Class

Enter Quarter for One-Time Disposal: 1 Qtr./Yr.

Handling Method: S.O.I

If Multiple Shipments Enter Frequency Here: 0.012 times/yr.

Volume: (lbs. nyr. only) 7,000 ^{Est.} lbs

Physical State of Waste @ 70°F

Flash Point (cc)

1. solid 2. liquid 3. N/A

1. N/A 2. < 60°F 3. 60-140°F 4. > 140°F

For DHEC Use Only:

Notes: _____

Date Received: _____
Month Date Year

Authorization Request Form

(Continued)

Facility Use Only:

--	--

Packaging for Shipment: In Drums (size) 55 gal In Bulk Other

Method of Transportation: Railroad tanker Truck Other: _____ Specific Gravity, </

Viscosity @ 70° F: Low Medium High Layering: None Dilayered Multilayered

Suspended Solids: % by weight or volume, Specify exact % </ Dissolved Solids: by % weight, Specify exact % </

Thousands of Dtu's/lbs. Specify: 8 to 10,000 Organically Bound Sulfur (wt. %): <0.1 Organically Bound Chloride: <0.1

Organically Bound Nitrogen (Wt %): <0.1 Toxicity: High Medium Unknown Ash %: <8

Affinity for Water: Hydrophilic Lipophilic pH (if hydrophilic):

Visual Description of Waste: Dark Brown Oil

Constituents: List specific constituents by name and corresponding percentage in waste stream.

Volatile Organics	%	Non-Volatile Organics	%	Acid or Alkalis	%	Salts & Inorganics	%
		<u>Oil: Lube</u>	<u>90</u>				
		<u>Oil</u>	<u>100%</u>				

Water: 40 %

Authorization Request Form

(Continued)

Metallics: (total metals not EP Toxicity Test)

As <u>25.0</u> ppm	Cr ⁺³ <u>45.0</u> ppm	Ag <u>25.0</u> ppm	Fe <u>20.2</u> ppm
Ba <u>100.0</u> ppm	Cr ⁺⁶ <u>1</u> ppm	Ni <u>20.2</u> ppm	Sb <u>20.2</u> ppm
Cd <u>1.0</u> ppm	Hg <u>20.2</u> ppm	Cu <u>20.2</u> ppm	Mn <u>20.2</u> ppm
Pb <u>25.0</u> ppm	Se <u>4.0</u> ppm	Tl <u>20.2</u> ppm	Co <u>20.2</u> ppm
Zn <u>20.2</u> ppm	_____ ppm	_____ ppm	_____ ppm

Toxics:

Cyanide <u>250</u> ppm
Pesticides <u>250</u> ppm
Carcinogens <u>250</u> ppm
Other Toxics <u>None</u> 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.

Signature: Charley Ferrell III Date Submitted: 4/29/94
 Print Name: CHARLEY FERRELL III Title: 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 TSD Facility's standard terms and conditions.

Signature: Donald F. Fitch Date Submitted: 06/08/94
 Print Name: Donald F. Fitch Title: Lab Director

Industrial Brokerage
Charles Foushee
1-704-396-2308

omni the total solution



June 13, 1994

PHONE:

Dana Container
7254 Mt Holly Road
Charlotte NC 28214

ATTN: Chuck Ferrell
FROM: XXXXXXXXXX

Nancy Coleman

RE: WASTE PROFILE NUMBER: Stream SE-16140-F003

Your Authorization Request Form has been submitted for you to SCDHEC on June 8, 1994. Unless there are questions, the legal date for first pickup will be June 23, 1994.

A copy of your ARF and 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.

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.

Southeastern Chemical Co.

755 Industrial Road

PO Box 1060

Sumter, SC 29151

803-773-1400

FAX: 803-775-7016

Toll Free: 800-872-7002

Authorization Request Form

Amendment New

South Carolina Department of Health and Environmental Control
200071 Bureau of Solid and Hazardous Waste
(803) 734-5200

- Landfill
- Recycle
- Landfarm
- Other
- Reclaim
- Incinerate
- Energy/Recovery

Nm

RECEIVED MAY 1993 (P)

TWP-attached

Authorization Number: SE - 116140 - F003

To be entered by TSD Facility

Generator Information:

Generator ID # NCDO74505850 Name DANA CONTAINER

Address 7254 MT HOLLY ROAD City CHARLOTTE State NC Zip Code 28214

Official Contact Chuck Ferrell Title compliance mgr. Telephone 704-399-3395
Area Code SC County (For In-state Generator Only)

Treatment, Storage, or Disposal Facility Information:

Facility EPA IUD # SCDO36275626 Name: SOUTHEASTERN CHEMICAL & SOLVENT COMPANY
755 Industrial Road • P.O. Drawer 1060
Sumter, SC 29151

Line # (This line # will always represent this specific waste stream)

DARK BROWN LIQUID

Description of Hazardous Waste

F003 F003 D001
EPA / DHEC Waste Codes

08
DOT Hazard Class

Process Producing Waste:
Tank Clean Out

DOT Code: PG Waste Flammable Liquid n.s.
(contains acetone & methyl chloride) 3
UN-1993 PG III

Enter Quarter for One-Time Disposal: 1 / 1 Qtr./Yr.

Handling Method: S01

If Multiple Shipments Enter Frequency Here: 0,0,0,4 times/yr.

Volume: (lbs./yr. only) 6000 Ext.

Physical State of Waste @ 70°F.

1. solid 2. liquid 3. N/A

Flash Point (cc)

1. N/A 2. < 60°F 3. 60-140°F 4. > 140°F

For DHEC Use Only:

Date Received: / /
Month Date Year

Notes: _____

Authorization Request Form

(Continued)

Facility Use Only:

Packaging for Shipment: In Drums (size) 55 gal In Bulk Other
 Method of Transportation: Railroad tanker Truck Other: _____ Specific Gravity: <1
 Viscosity @ 70° F: Low Medium High Layering: None Dilayered Multilayered
 Suspended Solids: % by weight or volume, Specify exact % 0 Dissolved Solids: by % weight, Specify exact % 0
 Thousands of Dtu's/lbs. Specify: 12-15,000 Organically Bound Sulfur (wt. %): <1 Organically Bound Chloride: <10
 Organically Bound Nitrogen (Wt %): <1 Toxicity: High Medium Unknown Ash %: <8
 Affinity for Water: Hydrophilic Lipophilic pH (if hydrophilic): 5-7
 Visual Description of Waste: dark brown liquid

Constituents: List specific constituents by name and corresponding percentage in waste stream.

Volatile Organics	%	Non-Volatile Organics	%	Acid or Alkalis	%	Salts & Inorganics	%
Acetone	30-35						
Methyl chloride	10-20						
Varnish	10-20						
Ethylene glycol	20-30						

Water: 15-20 %

Authorization Request Form

(Continued)

Metals: (total metals not EP Toxicity Test)

As <u>25.0</u> ppm,	Cr ³⁺ <u>25.0</u> ppm	Ag <u>25.0</u> ppm	Fe <u>20.2</u> ppm
Da <u>400.0</u> ppm	Cr ⁶⁺ <u>/</u> ppm	Ni <u>20.2</u> ppm	Sb <u>20.2</u> ppm
Cd <u>21.0</u> ppm	Hg <u>20.2</u> ppm	Cu <u>20.2</u> ppm	Mn <u>20.2</u> ppm
Pb <u>25.0</u> ppm	Se <u>21.0</u> ppm	Tl <u>20.2</u> ppm	Co <u>20.2</u> ppm
Zn <u>20.2</u> ppm	_____ ppm	_____ ppm	_____ ppm

Toxics:

Cyanide	<u>250</u> ppm
Pesticides	<u>250</u> ppm
Carcinogens	<u>250</u> ppm
Other Toxics	<u>None</u> 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.

Signature: Charley Ferrell III Date Submitted: 4-29-94
 Print Name: CHARLEY FERRELL III Title: 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 TSD Facility's standard terms and conditions.

Signature: Donald F. Fitch Date Submitted: 06/08/94
 Print Name: Donald F. Fitch Title: LAB Director

Industrial Brokerage
Charles Foushee
1-704-396-2308

omni the total solution

June 16, 1994

PHONE: 704-399-3395

Dana Container
7254 Mt Holly Road
Charlotte NC 28214

ATTN: Chuck Ferrell

FROM: ~~XXXXXXXXXX~~ *NANCY COLEMAN*

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 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.

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 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 1030

Sumter, SC 29151

803-773-1400

FAX: 803-775-7016

Toll Free: 800-872-7002

RECEIVED MAY 5 1994 (P)

South Carolina Department of Health and Environmental Control
Bureau of Solid and Hazardous Waste
(803) 734-5200

- Recycle
- Landfarm
- Other
- Incinerate
- Energy/Recovery

TULP-Attached

Authorization Number: SE - 116139 - F.O.O.1

To be entered by TSD Facility

165

Generator Information:

Generator ID # WCD074505850 Name DANA CONTAINER

Address 7254 Mt Holly Road City CHARLOTTE State NC Zip Code 28214

Official Contact CHUCK FERRELL Title Compliance mgr. Telephone 704-399-3395
Area Code SC County (For In-state Generator Only)

Treatment, Storage, or Disposal Facility Information:

Facility EPA IUD # SCDO36275626 Name: SOUTHEASTERN CHEMICAL & SOLVENT COMPANY
755 Industrial Road • P.O. Drawer 1060
Sumter, SC 29151

Line # (This line # will always represent this specific waste stream)

DARK BROWN LIQUID

Description of Hazardous Waste

F001 F002 F003 D001
EPA / DHEC Waste Codes

08
DOT
Hazard Class

Process Producing Waste:
Tanker cleanout
DOT Code: RQ, Waste Flammable Liquid, n.o.s.
(Contains Acetone & Oil) 3, UN-1993 PG-III

Enter Quarter for One-Time Disposal: 1/1 Qtr./Yr.

Handling Method: S.O.1

Multiple Shipments Enter Frequency Here: 0006 times/yr.

Volume: (lbs./yr. only) 15,000 lbs

Physical State of Waste @ 70°F

1. solid 2. liquid 3. N/A

Flash Point (cc)

1. N/A 2. < 60°F 3. 60-140°F 4. > 140°F

For DHEC Use Only:

Date Received: Month Date Year

Notes:

Authorization Request Form

(Continued)

Facility Use Only:

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Packaging for Shipment: In Drums (size) 55 gal In Bulk Other

Method of Transportation: Railroad tanker Truck Other: Specific Gravity: 0.2

Viscosity @ 70° F: Low Medium High Layering: None Bilayered Multilayered

Suspended Solids, % by weight or volume, Specify exact % NA Dissolved Solids, by % weight, Specify exact % NA

Thousands of Btu's/lbs. Specify: 8 to 10,000 Organically Bound Sulfur (wt. %): 0 Organically Bound Chloride: 2

Organically Bound Nitrogen (Wt %): 0 Toxicity: High Medium Unknown Ash %: 45

Affinity for Water: Hydrophilic Lipophilic pH (if hydrophilic): 4-6

Visual Description of Waste: DARK BROWN LIQUID

Constituents: List specific constituents by name and corresponding percentage in waste stream.

Volatile Organics	%	Non-Volatile Organics	%	Acid or Alkalis	%	Salts & Inorganics	%
Solvents: Acetone	20-30	Oil: kerosene	10-50				
{ methyl chloride		{ waste oil					
{ varnish		{ spent oil					
{ Ethylene glycol		Resins	10-15				
{ Ethylene		Potassium Chromate	10-15				
Gas	10-15	Amine	10-15				
		Anti-blaze	10-15				
		Wood Products	10-15				

Water: 5-10 %

Authorization Request Form

(Continued)

Metals: (total metals not EP Toxicity Test)

As <u>25.0</u> ppm,	Cr ⁺³ <u>25.0</u> ppm	Ag <u>25.0</u> ppm	Fe <u>20.2</u> ppm
Ba <u>200.0</u> ppm	Cr ⁺⁶ <u>/</u> ppm	Ni <u>20.2</u> ppm	Sb <u>20.2</u> ppm
Cd <u>21.0</u> ppm	Hg <u>20.2</u> ppm	Cu <u>20.2</u> ppm	Mn <u>20.2</u> ppm
Pb <u>25.0</u> ppm	Se <u>21.0</u> ppm	Tl <u>20.2</u> ppm	Co <u>20.2</u> ppm
Zn <u>20.2</u> ppm ppm ppm ppm

Toxics:

Cyanide <u>250</u> ppm
Pesticides <u>250</u> ppm
Carcinogens <u>250</u> ppm
Other Toxics <u>None</u> ppm

Other Information: _____

Certification:

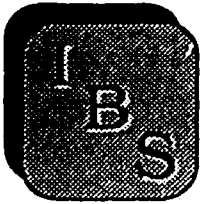
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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.

Signature: Charley Ferrell III Date Submitted: 4/29/94
 Print Name: CHARLEY FERRELL III Title: TANK WASHINGTON

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.

Signature: Donald F. Fitz Date Submitted: 06/10/94
 Print Name: DONALD F. FITZ Title: LAB DIRECTOR



Industrial Brokerage Services, Inc.

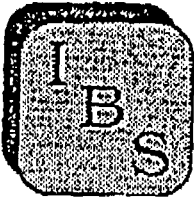
June 10, 1994

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

TO: CHUCK REF: AMOUNTS

PAGES INCLUDING THIS COVER: 7

MEMO: PLEASE SIGN AND FAX BACK TO ME
THESE ARE AMOUNTS

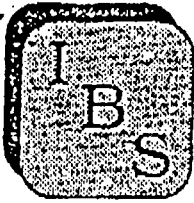
SIGN AT X'S SHOULD BE 4 TIMES

OFFICE (704) 396-4319 FAX (704) 396-2367 CAR (704) 396-0801

SOIL REMEDIATION, ENVIRONMENTAL AUDITS, WASTE BROKERAGE, WASTE
 TRANSPORTATION AND DISPOSAL, FULL SERVICE ANALYTICAL LABORATORY,
 UNDERGROUND STORAGE TANK MANAGEMENT.

THANK YOU

DAVID



Industrial Brokerage Services, Inc.

>>>>> FAX FACT <<<<<<

WASTE BROKERAGE
 AND
 ENVIRONMENTAL SERVICES
 DAVID L. HAYNES, ENGINEER
 P.O. BOX 1263
 LENOIR NC, 28645

TO: Citocl

REF: 11/00/00/00/00

PAGES INCLUDING THIS COVER: 7

MEMO: PLEASE SIGN AND FAX BACK TO ME
THESE ARE SIGNATURES

SIGN AT X'S SHOULD BE 4 TIMES

OFFICE (704) 396-4319 FAX (704) 396-2367 CAR (704) 396-0801

SOIL REMEDIATION, ENVIRONMENTAL AUDITS, WASTE BROKERAGE, WASTE
 TRANSPORTATION AND DISPOSAL, FULL SERVICE ANALYTICAL LABORATORY,
 UNDERGROUND STORAGE TANK MANAGEMENT.

THANK YOU

DAVID



New Amendment

A. GENERATOR INFORMATION

Generator Name DANA CONTAINER
Facility Address 7254 MT HOLLY ROAD
City/County CHARLOTTE
State NC Zip Code 28214
USEPA ID# NCD094505350
State ID#

Technical Contact DAVID HAYNES
Telephone (704) 396-4319 EXT.
Fax (704) 396-2367
Billing Name INDUSTRIAL BROKERAGE SERVICES
Billing Address P.O. BOX 1263
City CENOIR State NC Zip Code 28645
Attention
Telephone () EXT.

B. DOT Shipping Name HAZARDOUS WASTE SOLID
UNNA No. 2077 Packing Group II RO
Hazard Class 9

D. ANNUAL REPORT CODES

SIC Code:
Source Code: A
Form Code: B
Origin Code:
System Type: M

E. OTHER COMPONENTS

Table with columns: No, Yes, Total ppm. Rows: PCB's, Cyanides, Sulfides, Pesticides, Phenolics, Dioxins, Halogens.

C. RCRA RCRA Non Hazardous/Exempt? Yes No Process Generating: TANK CLEAN OUT
State Waste Codes: EPA Waste Codes: D002

F. PHYSICAL CHARACTERISTICS AT 70°F

- 1. Infectious or Biological Waste?
2. NRC Regulated Radioactive?
3. Reactivity: None, Water Reactive, Pyrophoric, Shock Sensitive, Cyanides, DOT Explosive, Sulfides, Other

Weight Density lbs./gal. (US, liq) lbs./cu. foot
Dry Weight
pH N/A, 0-2, 4.1-10, 2.1-4, 12.5, Exact

Dermal Toxicity LD50 (Mg/Kg)
Oral Toxicity LD50 (Mg/Kg)
Solids:
Liquids:

- Gas (Cylinder), Aerosol, Lab-Pack, Solid, Sludges, Free Liquids
100%

Flash Point (liquid only)
Boiling Point

Layers: Single Layered, Bi-layered, Multi-layered
Viscosity: Low, Medium, High

BTU/Lb. 15000

Odor: None, Mild, Strong Describe: SOLVENT

Color/Appearance: BLACK SOLID

H. PHYSICAL/CHEMICAL CONSTITUENTS

Table listing constituents: ALPHA NATHA (10%), CAUSTIC WASH (10%), WATER (10%), DIRT AND GRIT (85%), Total 100%

G. METALS

Table with columns: NONE, TCLP (MG/L), TOTAL (PPM), Req Limit, Below, Above, Range. Rows: Arsenic, Barium, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Zinc, Others.

- 5. Is this waste stored in vented drums?
6. Is this waste pumpable?
7. Is this waste polymerizable?
8. Is waste stream subject to the National Emission Standards for Benzene Waste Operations (40 CFR 81 Subpart FF)?
9. Is this waste regulated as an ozone depleting substance (40 CFR part 82)?
10. Does this waste contain scrap metal pieces greater than 2 inches in size?

I. ANTICIPATED VOLUME

Table with columns: Qty., Container, Qty., Container. Rows: 5 gal. pail, 15 gal. carboy, 30 gal. drum, 55 gal. drum, 85 gal. drum, Cubic Yard Box, Super Sack, Rolloff/Dump Trailer, Tanker, Other.

(*) Is this waste regulated as a Marine Pollutant (49 CFR 171.8)?

(Attach All 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.

Generator's Authorized Signature:

Handwritten signature: Charley Ferrell

Date: 8-17-94

Generator Name: DANA CONTAINER EPA ID#: NC002450

Location: 7254 MT HOLLY ROAD CHARLOTTE NC 28214

Profile #: _____

CHARACTERISTICS OF HAZARDOUS WASTE: Indicate if this waste contains any of the following characteristics based on criteria mandated by 40 CFR 261.21, 261.22, 261.23 and 261.24.

	*Regulatory Threshold Level	(Check One)		(Check One)		Actual Value
		(Check One)		Scientific Data	Generator's Knowledge	
		Yes	No			
D001 Characteristic of Ignitability	< 140°F	_____	_____	_____	_____	_____ °F
D002 Characteristic of Corrosivity	≤ 2 or ≥ 12.5	<input checked="" type="checkbox"/>	_____	_____	_____	_____ pH
D003 Characteristic of Reactivity		_____	<input checked="" type="checkbox"/>	_____	_____	_____

Constituent	*Regulatory Threshold Level, ppm	(Check One)		(Check One)		Actual Value ppm
		(Check One)		Scientific Data	Generator's Knowledge	
		Yes	No			
D004 (Arsenic)	5.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D005 (Barium)	100.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D006 (Cadmium)	1.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D007 (Chromium)	5.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D008 (Lead)	5.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D009 (Mercury)	0.2	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D010 (Selenium)	1.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D011 (Silver)	5.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D012 Endrin	0.02	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D013 Lindane	0.4	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D014 Methoxychlor	10.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D015 Toxaphene	0.5	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D016 2, 4-D (2,4-Dichloro- phenoxyacetic acid)	10.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D017 2,4,5- TP Silvex	1.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D018 Benzene	0.5	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D019 Carbon Tetrachloride	0.5	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D020 Chlordane	0.03	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D021 Chlorobenzene	100.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D022 Chloroform	6.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D023 o-Cresol	200.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D024 m-Cresol	200.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____
D025 p-Cresol	200.0	_____	<input checked="" type="checkbox"/>	_____	_____	_____

- Continued -

Constituent	*Regulatory Threshold Level, ppm	(Check One)				
		(Check One)		Scientific Data	Generator's Knowledge	Actual Value ppm
		Yes	No			
X026 Cresol	200.0		<input checked="" type="checkbox"/>			
X027 1,4-Dichlorobenzene	7.5		<input checked="" type="checkbox"/>			
X028 1,2-Dichloroethane	0.5		<input checked="" type="checkbox"/>			
X029 1,1-Dichloroethylene	0.7		<input checked="" type="checkbox"/>			
X030 2,4-Dinitrotoluene	0.13		<input checked="" type="checkbox"/>			
X031 Heptachlor (and its hydroxide)	0.008		<input checked="" type="checkbox"/>			
X032 Hexachlorobenzene	0.13		<input checked="" type="checkbox"/>			
X033 Hexachlorobutadiene	0.5		<input checked="" type="checkbox"/>			
X034 Hexachloroethane	3.0		<input checked="" type="checkbox"/>			
X035 Methyl ethyl ketone	200.0		<input checked="" type="checkbox"/>			
X036 Nitrobenzene	2.0		<input checked="" type="checkbox"/>			
X037 Pentachlorophenol	100.0		<input checked="" type="checkbox"/>			
X038 Pyridine	5.0		<input checked="" type="checkbox"/>			
X039 Tetrachloroethylene	0.7		<input checked="" type="checkbox"/>			
X040 Trichloroethylene	0.5		<input checked="" type="checkbox"/>			
X041 2,4,5-Trichlorophenol	400.0		<input checked="" type="checkbox"/>			
X042 2,4,6-Trichlorophenol	2.0		<input checked="" type="checkbox"/>			
X043 Vinyl Chloride	0.2		<input checked="" type="checkbox"/>			

* As defined by the TCLP (Method 1311), EP Toxicity is no longer acceptable.

LISTED* Hazardous Wastes: Indicate if this waste also contains any listed hazardous wastes coded in 40 CFR 261.31, 261.32, and 61.33 by including the appropriate EPA hazardous waste code(s).

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 fully completed, I authorize Laidlaw Environmental Services (TS), Inc. to conduct necessary testing at my expense and properly complete the form.

Signature: Charley Ferrell III

Print Name: CHARLEY FERRELL III

Date: 8-17-94

Title: TANK WASH MANAGER

THIS CERTIFICATION/RECERTIFICATION IS REQUIRED FOR EACH PROFILE TO LAIDLAW ENVIRONMENTAL SERVICES (TS), INC.

ORIGINAL SIGNATURE REQUIRED

Constituent	*Regulatory Threshold Level, ppm	(Check One)		(Check One)		Actual Value ppm
		Yes	No	Scientific Data	Generator's Knowledge	
X026 Cresol	200.0		<input checked="" type="checkbox"/>			
X027 1,4-Dichlorobenzene	7.5		<input checked="" type="checkbox"/>			
X028 1,2-Dichloroethane	0.5		<input checked="" type="checkbox"/>			
X029 1,1-Dichloroethylene	0.7		<input checked="" type="checkbox"/>			
X030 2,4-Dinitrotoluene	0.13		<input checked="" type="checkbox"/>			
X031 Heptachlor (and its hydroxide)	0.008		<input checked="" type="checkbox"/>			
X032 Hexachlorobenzene	0.13		<input checked="" type="checkbox"/>			
X033 Hexachlorobutadiene	0.5		<input checked="" type="checkbox"/>			
X034 Hexachloroethane	3.0		<input checked="" type="checkbox"/>			
X035 Methyl ethyl ketone	200.0		<input checked="" type="checkbox"/>			
X036 Nitrobenzene	2.0		<input checked="" type="checkbox"/>			
X037 Pentachlorophenol	100.0		<input checked="" type="checkbox"/>			
X038 Pyridine	5.0		<input checked="" type="checkbox"/>			
X039 Tetrachloroethylene	0.7		<input checked="" type="checkbox"/>			
X040 Trichloroethylene	0.5		<input checked="" type="checkbox"/>			
X041 2,4,5-Trichlorophenol	400.0		<input checked="" type="checkbox"/>			
X042 2,4,6-Trichlorophenol	2.0		<input checked="" type="checkbox"/>			
X043 Vinyl Chloride	0.2		<input checked="" type="checkbox"/>			

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Signature: Charley Ferrell III Date: 8-17-94

Print Name: CHARLEY FERRELL III Title: TANK WASH MANAGER

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TC RULE CERTIFICATION/RECERTIFICATION FORM

Generator Name: DANA CONTAINER

EPA ID#: NC007452

Location: 7254 MT HOLLY ROAD CHARLOTTE NC 28214

Profile #: _____

CHARACTERISTICS OF HAZARDOUS WASTE: Indicate if this waste contains any of the following characteristics based on criteria mandated by 40 CFR 261.21, 261.22, 261.23 and 261.24.

	*Regulatory Threshold Level	(Check One)		(Check One)		Actual Value
		(Check One)		Scientific Data	Generator's Knowledge	
		Yes	No			
D001 Characteristic of Ignitability	< 140°F	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	°F
D002 Characteristic of Corrosivity	≤ 2 or ≥ 12.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	pH
D003 Characteristic of Reactivity		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Constituent	*Regulatory Threshold Level, ppm	(Check One)		(Check One)		Actual Value ppm
		(Check One)		Scientific Data	Generator's Knowledge	
		Yes	No			
D004 (Arsenic)	5.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D005 (Barium)	100.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D006 (Cadmium)	1.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D007 (Chromium)	5.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D008 (Lead)	5.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D009 (Mercury)	0.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D010 (Selenium)	1.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D011 (Silver)	5.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D012 Endrin	0.02	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D013 Lindane	0.4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D014 Methoxychlor	10.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D015 Toxaphene	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D016 2, 4-D (2,4-Dichloro- phenoxyacetic acid)	10.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D017 2,4,5- TP Silvex	1.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D018 Benzene	0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D019 Carbon Tetrachloride	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D020 Chlordane	0.03	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D021 Chlorobenzene	100.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D022 Chloroform	6.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D023 o-Cresol	200.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D024 m-Cresol	200.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D025 p-Cresol	200.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

- Continued -

SERVAUG 17 '94 14:50 IBS INC

Constituent	*Regulatory Threshold Level, ppm	(Check One)		Scientific Data	Generator's Knowledge	Actual Value ppm
		Yes	No			
X026 Cresol	200.0		/		/	
X027 1,4-Dichlorobenzene	7.5		/		/	
X028 1,2-Dichloroethane	0.5		/		/	
X029 1,1-Dichloroethylene	0.7		/		/	
X030 2,4-Dinitrotoluene	0.13		/		/	
X031 Heptachlor (and its hydroxide)	0.008		/		/	
X032 Hexachlorobenzene	0.13		/		/	
X033 Hexachlorobutadiene	0.5		/		/	
X034 Hexachloroethane	3.0		/		/	
X035 Methyl ethyl ketone	200.0	/			/	
X036 Nitrobenzene	2.0		/		/	
X037 Pentachlorophenol	100.0		/		/	
X038 Pyridine	5.0		/		/	
X039 Tetrachloroethylene	0.7	/			/	
X040 Trichloroethylene	0.5		/		/	
X041 2,4,5-Trichlorophenol	400.0		/		/	
X042 2,4,6-Trichlorophenol	2.0		/		/	
X043 Vinyl Chloride	0.2		/		/	

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F002 F005 U220 U002 U239

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Signature: Charley Ferrell III Date: 8-17-94
 Print Name: CHARLEY FERRELL III Title: TANK WASH MANAGER

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SERVI AUG 17 '94 14:50 IBS INC

Constituent	*Regulatory Threshold Level, ppm	(Check One)		Scientific Data	Generator's Knowledge	Actual Value ppm
		Yes	No			
X026 Cresol	200.0		/		/	
X027 1,4-Dichlorobenzene	7.5		/		/	
X028 1,2-Dichloroethane	0.5		/		/	
X029 1,1-Dichloroethylene	0.7		/		/	
X030 2,4-Dinitrotoluene	0.13		/		/	
X031 Heptachlor (and its hydroxide)	0.008		/		/	
X032 Hexachlorobenzene	0.13		/		/	
X033 Hexachlorobutadiene	0.5		/		/	
X034 Hexachloroethane	3.0		/		/	
X035 Methyl ethyl ketone	200.0	/			/	
X036 Nitrobenzene	2.0		/		/	
X037 Pentachlorophenol	100.0		/		/	
X038 Pyridine	5.0		/		/	
X039 Tetrachloroethylene	0.7	/			/	
X040 Trichloroethylene	0.5		/		/	
X041 2,4,5-Trichlorophenol	400.0		/		/	
X042 2,4,6-Trichlorophenol	2.0		/		/	
X043 Vinyl Chloride	0.2		/		/	

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FOO2 F005 U220 U002 U239

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Signature: Charley Ferrell III

Date: 8-17-94

Print Name: CHARLEY FERRELL III

Title: TANK WASH MANAGER

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