

File ID Number: HWCB2016458

DEQ/DWM/Hazardous Waste Section

NCD/NCR (other) Number: NCD056478506

Facility Name: Kinder Morgan S.E. Terminals Charlotte 2

Address: 6801 Freedom Dr.

City: Charlotte

County: Mecklenburg

File Date Range: 11/12/82—01/22/04

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:

COPY

RCRA INSPECTION REPORT

1. **Facility Information:** Exxon Terminal
6801 Freedom Drive
Charlotte, NC 28208
NCD 056 478 506, Large Quantity Generator

PO Box 82
Paw Creek, NC 28130
2. **Facility Contact:** Mr. Robert Gaston, Terminal Superintendent
704-399-5696
3. **Survey Participants:** Mr. Robert Gaston
Mr. Denton Hollifield, Terminal Foreman
Mr. Sean Morris, Waste Management Specialist *sm*
4. **Date of Inspection:** January 22, 2004

Date of Report: January 22, 2004
5. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279.
6. **Facility Description:**

Exxon Terminal operates as a bulk storage and distribution facility for automotive and aviation fuels. The facility operates 24-hours a day and has six employees. The facility is situated on a 14-acre tract. Hazardous waste is generated from general cleaning and maintenance activities. These activities include sandblasting steel tanks, routine tank bottoms clean out, and replacing rubber vapor seals in tanks.

There are several air injection systems operating on the property for remediation of contaminated groundwater. The spent vapor carbon generated from this process is managed as non-hazardous waste and collected by US Filter. Used oil is generated from an oil water separator connected to the facility's secondary containment system. The oil water waste mixture is managed as used oil and is collected by Haz-Mat, Inc. All waste profiles were available at the time of the inspection.
7. **Waste Type:**
 - D008/D018, hazardous waste solid
 - D001/D008/D018, hazardous waste liquid
 - D018, hazardous waste solid (benzene)

8. Areas of Inspection:

Manifests:

All hazardous waste manifests were reviewed from the time of the last inspection on 12/13/01. All manifests were in good order and documented approved TSDs and transporters. LDR forms accompanied each manifest.

Transporters: Chemical Waste Management, Inc. – ALD 000 622 464
Horwith Trucking – PAD 146 714 878
Tri-State Motor Transit Company – MOD 095 038 998

TSDs: Chemical Waste Management, Inc. – ALD 000 622 464
Westates Carbon Arizona, Inc. – AZD 982 441 263
Ensco, Inc. – ARD 069 748 192

Waste Minimization:

The facility maintains a waste minimization plan onsite. The plan consists of recycling, using new technology for tank cleaning, eliminating truck washing, and using vapor recovery systems.

Weekly Inspections:

A documented log of weekly inspections at the facility's hazardous waste storage area was available for review at the time of the inspection. The inspection log was up to date. The facility does not always have hazardous waste in the storage area. Inspections are not conducted when there are not any drums in the storage area. Mr. Hollifield conducts each of the inspections. The inspection log indicates when waste is shipped from or added to the storage area.

Emergency Preparedness:

The facility has an alarm system for evacuation notice. The facility maintains spill control equipment and wheeled fire extinguishers. All fire extinguishers are checked monthly by facility personnel and annually by an outside contractor. All employees carry two-way radios. The fire department conducts routine visits to the facility. An emergency coordinator is always available. The facility has not had to implement the contingency plan in the last few years. The tank farm and pump islands are equipped with secondary containment. The facility maintains a NPEDS permit.

Training:

The facility maintains a written hazardous waste training program. An outline of the program was available at the time of the inspection. Three individuals receive

annual training. The last documented training was on 8/27/03. Larry Krupnik (Env. Specialist with Exxon) conducts the annual training. Job titles and job descriptions were also available as well as signatures of attendance to the last training session.

Biennial Report:

The facility submitted a biennial report on 2/27/03. The report looked to be completed correctly.

Contingency Plan:

The facility keeps a contingency plan on-site. The plan lists primary and secondary emergency coordinators. It includes the coordinator names, numbers, and addresses. The plan describes the type of emergency equipment available at the facility. The plan also lists emergency response procedures. Arrangements are listed in the plan and certified mail receipts were available that documented that the plan had been submitted to the appropriate agencies. The plan includes evacuation procedures.

Accumulation Areas:

There were (2) satellite accumulation areas at the facility at the time of the inspection.

Building #3 – One 55-gallon container labeled as used absorbent pads. The container was properly closed and labeled.

Vapor Recovery Area – One 55-gallon container labeled as used absorbent pads. The container was properly closed and labeled.

Hazardous Waste Storage Areas:

The facility has one < 90-day hazardous waste storage area. The area is located on an outside concrete pad at the back of the property. The area is posted with “no smoking” signs and a fire extinguisher is located nearby. There were not any containers of hazardous waste at the storage area at the time of the inspection. All employees carry two-way radios when visiting the area.

Universal Waste and Used Oil Management:

The facility generates used oil from their oil water separator. I did not note any containers of used oil at the facility at the time of the inspection.

9. Site Deficiencies:

No violations noted.

 1/23/04
INSPECTOR (DATE)

**(SENT BY US MAIL)
FACILITY CONTACT**

cc:
MRO Files
Jesse Wells, Western Area Compliance Supervisor
Central Office Files
Robert Gaston, Exxon Terminal

LQG INSPECTION CHECKLIST

FACILITY NAME:	<u>EXXON TERMINAL</u>
DATE:	<u>1/22/04</u>
EPA ID #:	<u>NCD 056 478 506</u>
PARTICIPANTS:	<u>DENTON HOLLIFIELD - TERMINAL FOREMAN</u> <u>ROBERT GASTON - FACILITY CONTACT.</u>

FACILITY WALKTHROUGH INSPECTION

- **MAXIMUM STORAGE TIME-262.34 (a)** *COMPLIANCE YES/NO _____
90 days or less.
- **CONTAINER DATES-262.34 (a) (2)** *COMPLIANCE YES/NO _____
Containers must be dated when accumulation begins.
- **LABELING-262.34 (a) (3)** *COMPLIANCE YES/NO _____
Containers in storage area must be labeled "hazardous waste". Containers in the satellite accumulation areas must also be labeled "hazardous waste" or labeled with content description as described in 262.34 (c) (ii).
- **CONDITION OF CONATINERS-265.171** *COMPLIANCE YES/NO _____
If container-holding waste is leaking or in poor condition the waste must be transferred to a container in good condition.
- **COMPATIBILITY OF WASTE WITH CONTAINERS-265.172** *COMPLIANCE YES/NO _____
Container must be compatible with waste.
- **MANAGEMENT OF CONTAINERS-265.173 (storage+accum.)** *COMPLIANCE YES/NO _____
(a) Container must be closed except when adding or removing waste
(b) Container must not be handled or stored in a manner that will cause it to leak.
- **INCOMPATIBLE WASTE-265.177** *COMPLIANCE YES/NO _____
(a) Same containers must not be used for incompatible waste.
(b) Incompatible waste should not be placed in unwashed containers that held incompatible waste.
(c) A dike, berm, wall, or other device should separate incompatible waste or material.
- **IGNITABLE OR REACTIVE WASTE-265.176**
Containers holding ignitable or reactive waste must be located at least 50 feet from facility's property line.

• MAINTENANCE AND OPERATION OF FACILITY-265.31 *COMPLIANCE YES/NO _____

Facility must be operated to minimize the possibility of a fire or any unplanned sudden or non-sudden release of hazardous waste that threatens health or environment.

• REQUIRED EQUIPMENT-265.32 *COMPLIANCE YES/NO _____

Facilities must have the following equipment unless not needed.

- ✓ a) Internal communications or alarm system that provides emergency instruction to personnel.
- ✓ b) A telephone or two-way radio must be available at the scene of operation to summon emergency assistance. *ALARM - PULL DOWN*
- ✓ c) Fire extinguishers and fire control equipment spill control, and decontamination equipment.
- ✓ d) Adequate water volume and pressure to supply fire hoses, automatic sprinklers, or water spray systems *SMALL SPILL PADS - DOORS*

FOAM
SPRINKLER
SYSTEM

IN HOUSE FIRE EXT. MONTHLY.
OUTSIDE CONTRACTOR ANNUAL.

• ACCESS TO COMMUNICATIONS OR ALARM-265.34 *COMPLIANCE YES/NO _____

- a) Whenever hazardous waste is being handled, all personnel involved must have access to an alarm or communication device. Visual or voice contact is allowed.
- b) If there is just one person at the facility, while in operation, they must have immediate access to a telephone or two-way radio capable of summoning emergency assistance.

• REQUIRED AISLE SPACE-265.35 *COMPLIANCE YES/NO _____

Aisle space must be maintained to allow unobstructed movement of personnel or safety equipment.

• PROPER D.O.T. CONTAINERS-262.30 *COMPLIANCE YES/NO _____

• SATELLITE ACCUMULATION AREA-262.34 (c) (1) *COMPLIANCE YES/NO _____

No more than 55-gallons accumulated at the satellite accumulation areas.

• SPILLS-262.34 (a) (1) (i) *COMPLIANCE YES/NO _____

Waste must be placed in containers.

DOCUMENT REVIEW

✓ • INSPECTIONS-265.174 *COMPLIANCE YES/NO ✓

Must complete weekly inspections of containers in storage. Look for leaks or corrosion.

• TESTING AND MAINTENANCE OF EQUIPMENT-265.33 *COMPLIANCE YES/NO _____

All equipment listed in this section should be tested and maintained to assure operation in case of an emergency.

LAST DOCUMENTED INSPECTION 10/6/03
5 DRUMS SHIPPED THAT DAY

Facility Description: OIL WATER SEPARATORS, TANKS BOTTOMS, RUBBER SEALS IN TANK TOPS, VAPOR, 6-EMPLOYEES 14 ACRE TRACT. CLEAN TANKS EVERY 10 YEARS.

SAND BLASTING OF EXTERNAL STEEL TANKS - LEAD BASED PAINT

USED OIL COLLECTED BY HAZ-MAT AND AARON OIL COMPANY, INC. GENERATE SPENT VAPOR CARBON + SPENT WATER CARBON - US FILTER COLLECTS AS NON-HAZ.

Waste Streams: HAZARDOUS WASTE SOLID - D008 / D018
HAZARDOUS WASTE LIQUID - D001 / D009 / D018
HAZ-WASTE SOLID (BENZENE) - D018

6/6/03 - 1000P
7/17/03 - 1400P
4/27/03 - 4800P
3/25/03 - 2500P

TSD Facilities: CHEMICAL WASTE MANAGEMENT, INC. ALD 000 622 464
WESTATES CARBON ARIZONA INC. - AZD 982 441 263
ENSCO, INC. - ARD 069 748 192

SIGNS
ROBERT GASTON

Transporters: CHEMICAL WASTE MANAG. ALD 000 622 464
HORNATH TRUCKING PAD 146 214 878
TRI-STATE MOTOR TRANSIT CO. MOD 095 038 998

WASH WATER ?
PAINT CHIPS
VAPOR CARBON ?

• ARRANGEMENTS WITH LOCAL AUTHORITIES-265.37 *COMPLIANCE YES/NO _____

(A) Arrangement for services should be made with the following:

• FIRE DEPT. DOES ROUTINE VISITS

- 1) Arrangements to familiarize emergency authorities with the facility layout and properties of hazardous waste handled and entrance and evacuation roads.
- 2) Primary response agencies should be established with all emergency responders. All others will support.
- 3) Arrangements with state emergency response teams, contractors, and equipment suppliers.
- 4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled.

(B) Documentation from any local authorities that decline any of the emergency arrangements

✓ • EMERGENCY COORDINATOR-265.55 *COMPLIANCE YES/NO Y

An emergency coordinator should be on the premises or on call at all times. Must be able to respond in a short period of time. The coordinator must be familiar with all aspects of the contingency plan, operations, locations of haz-waste, record locations, and facility layout. Person must have the authority to commit resources needed to carry out contingency plan. GOING TO FAX UPDATED LIST.

✓ • EMERGENCY PROCEDURES 265.56 *COMPLIANCE YES/NO Y

NO ACCIDENTS OR SPILLS REQUIRING ACTION IN LAST COUPLE YEARS.

- a) During an emergency event the coordinator must immediately:
 - (1) - Activate facility alarms or communication system to alert all personnel.
 - (2) Notify appropriate state or local agencies as needed.
- b) In the event of a fire, explosion, or release, the coordinator must identify character, exact source, amount, and extent of problem. This can be done by observation, records, or chemical analysis.
- c) Coordinator must assess all possible direct and indirect effects of the event.
- d) If the coordinator determines that a fire, explosion, or release has occurred he must report his findings as follows:
 - (1) Must notify proper authorities if evacuation is needed. Must be available to help decide what areas should be evacuated.
 - (2) Must notify government on-scene coordinator or National Response Center.
- e) Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste. These measures include stopping production, collecting or containing releases and isolating containers.
- f) If facility stops operations the coordinator must monitor for leaks, pressure buildup, gas generation, ruptures in valves, pipes, or other equipment.
- g) After an emergency the coordinator must provide for disposal for all released waste, contaminated soil or surface water, or other material.
- h) Coordinator must ensure that affected part of the facility:
 - (1) No incompatible waste with released material is stored until cleanup is complete.
 - (2) All emergency equipment is cleaned and fit for use.
- i) The owner or operator must notify government agencies before resuming operations.
- j) The owner or operator must note the time, date, and details of any incident that requires the implementing of the contingency plan. The report must be submitted to EPA or State within 15 days of the incident. *see section for specifics to be included in report.

✓ • PART 262 SUBPART B-THE MANIFEST: *COMPLIANCE YES/NO Y

Manifests required for all hazardous waste shipped off site. They must include necessary signatures as stated in 262.20.

✓ • LDR CERTIFICATION 268.7 (a) (4) *COMPLIANCE YES/NO Y

Land Disposal Restrictions must accompany all waste streams sent to TSDF.

Satellite Area Notes:

• BUILDING #3 (1) 55-GALLON CONT.
FOR USED AIRBORNE PADS
LABELLED AND CLOSED.

• VAPOR RECOVERY AREA
(1) 55-GALLON CONT.
USED AIRBORNE PADS
LABELLED + CLOSED.

Hazardous Waste Storage Area Notes:

NO CONT. IN STORAGE NO SMOKING SIGNS POSTER
FIRE EXT. IN PLACE.

WHEELED
FIRE
EXTINGUISHER

USED OIL:

SAND BLASTING: AROUND EVERY 10 YEAR
CLEAN OUT

VAPOR CARBON:
REMEDIATION
SYSTEM ON-SITE

- LARRY KRUPNIK
EXXON
ENV. SPECIALIST.

✓ • APPROVED TSD'S AND TRANSPORTERS 262.12 (c) *COMPLIANCE YES/NO Y

Generators must use approved TSD's and Transporters with valid EPA ID numbers.

✓ • WASTE MINIMIZATION PLAN ON-SITE *COMPLIANCE YES/NO Y REVISED 2/27/03

✓ • RECORDKEEPING 262.40 *COMPLIANCE YES/NO Y

- ✓a) Manifest must be kept for three years
- ✓b) Biennial Reports must be kept for three years. (does not apply to SGQ)
- ✓c) Waste analyses or test results must be kept for three years
- d) If enforcement actions are taken these time periods are extended.

• RECYCLING
• NEW TECH. FOR TANK CLEANING
• NO TRUCK WASHING
• USING VAPOR RECOVERY SYSTEMS. RETURNS TO LIQUID STATE

✓ • BIENNIAL REPORT SUBMITTED 262.41 (a) *COMPLIANCE-YES/NO Y SUBMITTED 2/21/02

✓ • CONTINGENCY PLAN-265.51 *COMPLIANCE YES/NO Y

AMENDED ~~2/21/02~~
IN 2000.

- ✓(a) Each owner or operator must have a contingency plan for their facility.
- ✓(b) Plan must be carried out in the event of a fire, explosion, or release of hazardous waste that could threaten health or environment.

• CONTENT OF CONTINGENCY PLAN 265.52 *COMPLIANCE YES/NO Y

- ✓a) Plan must describe the actions personnel must take to respond to event.
- ✓b) SPCC plan can be amended to include required content in this subpart.
- ✓c) Plan must describe arrangements agreed to by local police, fire, hospitals, contractors, and state agencies.
- ✓d) The plan must list names, addresses, and phone numbers (home and office) for all emergency coordinators. List must be kept up to date. Primary coordinator and secondary coordinators should be listed.
- ✓e) Plan must include a list of all emergency equipment and alarms at the facility. List should show locations and physical descriptions of equipment. List must remain up to date.
- ✓f) The plan must include an evacuation plan if evacuation may be required. The plan should describe signals, evacuation routes, and alternate evacuation routes.

• MR. GASTON'S
PRIMARY
INFO IN
E.R.A.P.
• MR. HOWFIELD
IS BACKUP

• COPIES OF THE CONTINGENCY PLAN 265.53 *COMPLIANCE YES/NO _____

Contingency plans and revisions must be:

- ✓a) Maintained at the facility.
- ✓b) Submitted to all local police, fire, hospitals, state agencies, and emergency response teams.

✓ • AMENDMENT OF CONTINGENCY PLAN 265.54 *COMPLIANCE YES/NO Y

Plan must be amended when content of plan changes. *See Part 265 Subpart D for individual reasons for amendments.

✓ • PERSONNEL TRAINING-265.16

*COMPLIANCE YES/NO ✓

- ✓ a) (1) 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 to ensure compliance with this sections requirements.
- ✓ (2) Training must be conducted by a person trained in hazardous waste management procedures and training must include hazardous waste management training relevant to each employees position (including contingency plan implementation).
- ✓ (3) Training should de designed to ensure that personnel can respond properly to emergencies.
- ✓ b) Personnel must complete the training within six months of there hire date or when they change job responsibilities.
- ✓ c) Personnel must take part in an annual review of the initial training.
- d) The following documents must be maintained at the facility:
 - ✓ (1) Job title and person filling position for each position related to hazardous waste management.
 - ✓ (2) A job description for each position listed above, including requisite skills, education, and qualifications. Position duties should also be recorded.
 - ✓ (3) A written description of the type and amount of initial and continuing training that will be given for each position.
 - ✓ (4) Records that document that the training or job experience have been completed by personnel.
- ✓ e) Training records on current personnel must be kept until closure of the facility. Training records on all former employees must be kept for at least three years from date of seperation

LARRY KRUPNIK
CONDUCTS TRAINING
FROM CORPORATE

8/27/03 LAST TRAINING TOOK PLACE 8/27/03
• ROBERT GASTON, DENTON H, AND RICHARD SEMCHESKI

General Inspection Notes:

- JOB DESCRIPTION AND TITLE FOR ROBERT GASTON AND RICHARD SEMCHESKI.
- EMERGENCY COORD. LIST.

RCRA INSPECTION REPORT

1. **Facility Information:** Kinder Morgan (former Exxon Terminal)
6801 Freedom Drive
Charlotte, NC 28208
NCD 056 478 506, Small Quantity Generator

Charlotte #2
PO Box 82
Paw Creek, NC 28130
2. **Facility Contact:** Mr. Robert Gaston, Terminal Superintendent
704-399-5696
3. **Survey Participants:** Mr. Robert Gaston
Mr. Mark Burnette, Waste Management Specialist
Mr. Sean Morris, Waste Management Specialist
4. **Date of Inspection:** March 30, 2005

Date of Report: March 31, 2005
5. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279.
6. **Facility Description:**

Kinder Morgan operates as a bulk storage and distribution facility for automotive and aviation fuels. The facility operates 2-shifts a day and has five employees. The facility is situated on a 14-acre tract. Hazardous waste is generated from general cleaning and maintenance activities. These activities include sandblasting steel tanks, routine tank bottoms clean out, and replacing rubber vapor seals in tanks every 20 years.

There are several air injection systems operating on the property for remediation of contaminated groundwater. The spent vapor carbon generated from this process is managed as non-hazardous waste and collected by US Filter. Used oil is generated from an oil water separator connected to the facility's secondary containment system. The oil water waste mixture is managed as used oil and is collected by Haz-Mat, Inc. All waste profiles were available at the time of the inspection.

The facility changed ownership on March 9, 2004. The facility re-notified as a small quantity generator in April of 2004.

7. Waste Type:

- D008/D018, hazardous waste solid
- D001/D008/D018, hazardous waste liquid
- D018, hazardous waste solid (benzene)

8. Areas of Inspection:**Manifests:**

Hazardous waste has not been shipped since the last inspection conducted on 1/22/04.

Transporters: Chemical Waste Management, Inc. – ALD 000 622 464
Horwith Trucking – PAD 146 714 878
Tri-State Motor Transit Company – MOD 095 038 998

TSDs: Chemical Waste Management, Inc. – ALD 000 622 464
Westates Carbon Arizona, Inc. – AZD 982 441 263
Ensco, Inc. – ARD 069 748 192

Waste Minimization:

The facility maintains a waste minimization plan onsite. The plan consists of recycling, using new technology for tank cleaning, eliminating truck washing, and using vapor recovery systems.

Weekly Inspections:

A documented log of weekly inspections at the facility's hazardous waste storage area was available for review at the time of the inspection. The inspection log was up to date. The facility does not always have hazardous waste in the storage area. Inspections are not conducted when there are not any drums in the storage area. The inspection log indicates when waste is shipped from or added to the storage area.

Emergency Preparedness:

The facility has an alarm system for evacuation notice. The facility maintains spill control equipment and wheeled fire extinguishers. All fire extinguishers are checked monthly by facility personnel and annually by an outside contractor. All employees carry two-way radios. The fire department conducts routine visits to the facility. An emergency coordinator is always available. The facility has not had to implement the contingency plan in the last few years. The tank farm and

pump islands are equipped with secondary containment. The facility maintains a NPEDS permit.

Training:

The facility maintains a written hazardous waste training program. An outline of the program was available at the time of the inspection. All personnel also receive Haz-Woper training. Job titles and job descriptions were also available as well as signatures of attendance to the last training session.

Biennial Report:

The facility submitted a biennial report on 2/20/04 for waste generated while the facility was still classified as a Large Quantity Generator. The report looked to be completed correctly. Small Quantity Generators are not required to submit a Biennial Report.

Contingency Plan:

The facility keeps a contingency plan on-site. All of the necessary information for a small quantity generator plan is posted in the front office. The only item I recommended be posted was the locations of fire extinguishers (see recommendation).

Accumulation Areas:

The facility maintains one satellite accumulation area.

Building #3 – There was not any hazardous waste at the satellite accumulation area.

Hazardous Waste Storage Areas:

The facility has one < 90-day hazardous waste storage area. The area is located on an outside concrete pad at the back of the property. The area is posted with “no smoking” signs and a fire extinguisher is located nearby. There were not any containers of hazardous waste at the storage area at the time of the inspection. All employees carry two-way radios when visiting the area.

Universal Waste and Used Oil Management:

The facility generates used oil from their oil water separator. I did not note any containers of used oil at the facility at the time of the inspection. Used oil is recycled back into regular unleaded gasoline. The facility uses AERC Recycling Solutions for universal waste lamp collection. The last documented collection date was 2/27/03.

9. Site Deficiencies:

No violations noted.

10. Recommendations:

- It is recommended that the locations of all fire extinguishers, spill control equipment, fire alarms, name and phone numbers for emergency coordinators, and the fire departments phone number, be posted next to phones at the facility.

 3/31/05
INSPECTOR (DATE)

(SENT BY US MAIL)
FACILITY CONTACT

cc:
MRO Files
Jesse Wells, Western Area Compliance Supervisor
Central Office Files
Robert Gaston, Exxon Terminal

INSPECTION NOTES

1

RCRA INSPECTION REPORT →

1. Facility Information: Exxon Terminal
6801 Freedom Drive
Charlotte, NC 28208
NCD 056 478 506, Large Quantity Generator - ~~PERMITTED TO~~ SQG → APRIL '04
PO Box 82
Paw Creek, NC 28130
• KINDER MORGAN • CHANGED OWNERSHIP MARCH 9, 2004
2. Facility Contact: Mr. Robert Gaston, Terminal Superintendent
704-399-5696
3. Survey Participants: Mr. Robert Gaston
~~Mr. Denton Hollifield, Terminal Foreman~~
Mr. Sean Morris, Waste Management Specialist
MARK B
4. Date of Inspection: ~~January 22, 2004~~ 3/30/05
Date of Report: ~~January 22, 2004~~
5. Purpose of Inspection: To determine compliance with 40 CFR 260-279.
6. Facility Description:
Exxon Terminal operates as a bulk storage and distribution facility for automotive and aviation fuels. The facility operates ~~24 hours~~ ^{3 SHIFTS} a day and has ~~six~~ ^{FIVE} employees. The facility is situated on a 14-acre tract. Hazardous waste is generated from general cleaning and maintenance activities. These activities include sandblasting steel tanks, routine tank bottoms clean out, and replacing rubber vapor seals in tanks. *EVERY 20 YEARS*
- There are several air injection systems operating on the property for remediation of contaminated groundwater. The spent vapor carbon generated from this process is managed as non-hazardous waste and collected by US Filter. Used oil is generated from an oil water separator connected to the facility's secondary containment system. The oil water waste mixture is managed as used oil and is collected by Haz-Mat, Inc. All waste profiles were available at the time of the inspection.
7. Waste Type:
- D008/D018, hazardous waste solid
 - D001/D008/D018, hazardous waste liquid
 - D018, hazardous waste solid (benzene)

*NO WASTE
UP STORAGE
AREA*

*PUMP OUT OIL
WATER SEPARATOR
US FILTER COLLECTS
STORM-WASTE WATER.*

NPDES PERMIT ↑

8. Areas of Inspection:

Manifests:

NO SHIPMENTS OF HAZ-WASTE SINCE LAST INSPECTION.

All hazardous waste manifests were reviewed from the time of the last inspection on 12/13/01. All manifests were in good order and documented approved TSDs and transporters. LDR forms accompanied each manifest.

Transporters: Chemical Waste Management, Inc. – ALD 000 622 464
Horwith Trucking – PAD 146 714 878
Tri-State Motor Transit Company – MOD 095 038 998

TSDs: Chemical Waste Management, Inc. – ALD 000 622 464
Westates Carbon Arizona, Inc. – AZD 982 441 263
Ensco, Inc. – ARD 069 748 192

Waste Minimization:

X The facility maintains a waste minimization plan onsite. The plan consists of recycling, using new technology for tank cleaning, eliminating truck washing, and using vapor recovery systems.

Weekly Inspections:

✓ A documented log of weekly inspections at the facility's hazardous waste storage area was available for review at the time of the inspection. The inspection log was up to date. The facility does not always have hazardous waste in the storage area. Inspections are not conducted when there are not any drums in the storage area. Mr. Hollifield conducts each of the inspections. The inspection log indicates when waste is shipped from or added to the storage area.

Emergency Preparedness:

The facility has an alarm system for evacuation notice. The facility maintains spill control equipment and wheeled fire extinguishers. All fire extinguishers are checked monthly by facility personnel and annually by an outside contractor. All employees carry two-way radios. The fire department conducts routine visits to the facility. An emergency coordinator is always available. The facility has not had to implement the contingency plan in the last few years. The tank farm and pump islands are equipped with secondary containment. The facility maintains a NPEDS permit.

ROBERT CASTON

Training:

- NO SPILLS SINCE LAST TIME

ARRANGEMENTS LISTED IN CONT. PLAN.

The facility maintains a written hazardous waste training program. An outline of the program was available at the time of the inspection. Three individuals receive

ALL PERSONNEL HAZ WASTE TRAINED HAZ-WASTE INLLUGER

- KEN BENIG BIRNGAR CONDUCTS TRAINING COM.

annual training. The last documented training was on 8/27/03. ~~Larry Krupnik (Env. Specialist with Exxon) conducts the annual training. Job titles and job descriptions were also available as well as signatures of attendance to the last training session.~~ STILL DOCUMENTED.

Biennial Report:

- X The facility submitted a biennial report on 2/27/03. The report looked to be completed correctly.

Contingency Plan:

The facility keeps a contingency plan on-site. The plan lists primary and secondary emergency coordinators. It includes the coordinator names, numbers, and addresses. The plan describes the type of emergency equipment available at the facility. The plan also lists emergency response procedures. Arrangements are listed in the plan and certified mail receipts were available that documented that the plan had been submitted to the appropriate agencies. The plan includes evacuation procedures.

Accumulation Areas:

There were (2) satellite accumulation areas at the facility at the time of the inspection.

Building #3 – One 55-gallon container labeled as used absorbent pads. The container was properly closed and labeled.

~~Vapor Recovery Area – One 55-gallon container labeled as used absorbent pads. The container was properly closed and labeled.~~

Hazardous Waste Storage Areas:

The facility has one < 90-day hazardous waste storage area. The area is located on an outside concrete pad at the back of the property. The area is posted with “no smoking” signs and a fire extinguisher is located nearby. There were not any containers of hazardous waste at the storage area at the time of the inspection. All employees carry two-way radios when visiting the area.

Universal Waste and Used Oil Management:

The facility generates used oil from their oil water separator. I did not note any containers of used oil at the facility at the time of the inspection.

- BULBS SENT BACK TO SUPPLIER FOR TRANSPORT TO RE

- BLEND USED OIL INTO REGULAR GASOLINE.

- AERC RECYCLING SOLUTIONS - 2/27/03 LAST PICK UP

KINDER MORGAN (formerly EXXON Terminal)

PREPARED BY	MAF
DATE	3/30/05

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ROBERT GONSTON - Terminal Super.

Formerly LQ6 → changed to 566 4/04

Biennial Report Submitted 2/30/04

DO18	HW Soid Benzene	15300
DO08, DO18	HW Soid	2100
DO01	HW Lig	300

Weekly Inspections: Had all from 1/03 - Present

FACILITY INFORMATION:	Submittal Information	Initial By -	Date -	Corrected By -	Date -	
	EPA ID Number:	RCRA Comp. Section:	_____	___/___/___	_____	___/___/___
<div style="border: 1px solid black; padding: 2px; display: inline-block;"> N C N O 5 6 4 7 8 5 0 6 </div>		Received:	_____	___/___/___	_____	___/___/___
		Entered/Returned:	_____	___/___/___	_____	___/___/___

Facility Name: Exxon Terminal City: Charlotte

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: <u>S</u>	Date: <u>112</u> / <u>113</u> / <u>011</u>	Type: <u>CEII</u>	Control Number Data Entry Personnel
Person: <u>0319</u>	Reason: <u> </u>		

Evaluation Comments:
 (74) 1 : Facility in compliance - no violation
 2 :

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) _____ Date of determination: _____
 - a SNC (SNY evaluation)
 or - no longer a SNC (SNN eval.) Same as above eval.: - or - / /

VIOLATION DATA: New: Change: Delete:

_____ Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: / / -- Scheduled -- Actual / /
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: / / -- Scheduled -- Actual / /
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: / / -- Scheduled -- Actual / /
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

RCRA INSPECTION REPORT

1. **Facility Information:** Exxon Terminal
6801 Freedom Drive
Charlotte, N.C. 28208
NCD 056 478 506, Large Quantity Generator
2. **Facility Contact:** Mr. Denton Hollifield, Terminal Foreman
704.399.5696
3. **Survey Participants:** Mr. Denton Hollifield
Mr. Brad Murphy, Waste Management Specialist, HWS
4. **Date of Inspection:** December 13, 2001
Date of Report: December 14, 2001
5. **Purpose of Inspection:** To determine compliance with 40 CFR 262, 265 and 268.
6. **Facility Description:**

Exxon Terminal (Exxon) operates as a bulk storage facility for fuels destined for distribution.

7. **Type Waste:**

- D001/D018, Hazardous waste solids (benzene, gasoline)
- D008/D018, Hazardous waste solids (benzene, lead)

8. **Areas of Inspection:**

Manifests:

The facility's hazardous waste manifests were reviewed since the last inspection on May 10, 2000. Of the hazardous waste manifests reviewed, all were found in good order, had approved transporters and TSDs, and were accompanied with Land Disposal Restriction certifications.

Transporters: Tri-State Motor Transit - MOD 095 038 998

TSDs: ENSCO - ARD 069 748 192

Waste Minimization:

The facility's waste minimization plan consists of shipping their off-spec product oil/water mixture back to their Baton Rouge facility.

NY

PO Box 82
PAW CREEK, NC
28130

Weekly Inspections:

The facility conducts and documents weekly inspections on hazardous waste storage areas. The facility does not always have hazardous waste containers in the 90-day storage area, so inspections are only conducted when containers are in storage.

Contingency Plan:

Exxon maintains a contingency plan on-site. The plan lists emergency coordinators and their home phone numbers and addresses. Evacuation signals are described in the plan, and the primary/secondary routes are depicted on facility maps. The location of all fire extinguishers and spill control kits are included in the plan, along with their capabilities. The location of all emergency equipment is also depicted on facility maps. Agreements with local authorities are documented in the plan.

Training:

Exxon has a hazardous waste training program. The last training session was conducted in October 30, 2001. All employees handling and/or managing hazardous waste have received the appropriate training. Job titles are provided for all employees receiving the training. Exxon maintains general job descriptions for employees at the facility, but they do not specifically detail all RCRA job duties. All personnel must be able to function as the emergency coordinator, so all employees have the same basic RCRA job description. It is recommended that, above and beyond the responsibilities delegated to each employee as an emergency coordinator, Exxon further describe each employee's job duties as they relate to hazardous waste manifests (labeling drums, weekly inspections, ensuring containers are closed, preparing manifests, etc.)

Biennial Report:

Exxon submitted the biennial report on February 2, 2000 for waste generated in 1999.

Emergency Preparedness:

The facility operates two (2) hazardous waste accumulation areas and one (1) hazardous waste storage area. The facility has an internal alarm system which is used for the announcement of evacuation procedures and emergencies. A description of the types of alarms and evacuation procedures are included in the contingency plan. Fire fighting equipment, including water and foam suppression at the fuel filling rack and extinguishers, is located throughout the facility and is tested internally. Spill kits, including absorbant, PPE and booms, are also located throughout the facility and checked for content regularly. At all locations where hazardous waste is either stored or accumulated, personnel have immediate access to two-way radios.

Accumulation Areas:

The facility operates two (2) hazardous waste accumulation areas at the facility. The location and description of each area follows:

1. VRU Area - One (1) 55-gallon container holding D001/D018 hazardous waste solids. The container was properly labeled and closed.
2. Maintenance Building - One (1) 55-gallon container holding D001/D018 hazardous waste solids. The container was properly labeled and closed.

Hazardous Waste Storage Area:

There is one (1) hazardous waste storage area at the facility. The location and description of this area follows:

1. Hazardous Waste Storage Area - This area is a cordoned-off section of a loading dock near the maintenance building. Spill control equipment was nearby, and the area was marked as "Hazardous Waste Storage." At the time of the inspection, no hazardous waste was in storage.

9. Site Deficiencies:

No site deficiencies were observed during this inspection. Facility in full compliance.

10. Recommendations:

- A. It is recommended that the facility formalize job descriptions for employees that handle and/or manage hazardous waste. Exxon maintains general job descriptions, but a more detailed, concise list of job duties is recommended for each employee at the facility involved in the hazardous waste management training. Please note that this will be a point of emphasis during your next compliance evaluation inspection.


INSPECTOR (DATE)

RCRA INSPECTION REPORT

X = VIOLATION NOTED NA = NOT APPLICABLE

Facility Name: Exxon Terminal
Location: 6801 Freedom Dr. Charlotte, NC 28208
Mailing Address: PO Box 82, Paw Creek, NC 28130
EPA ID#: NCD 056 478 506 Phone Number: 704.399.5696
Contact/Title: George Reagan (retired) Denton, Hollyfield, Terminal Foreman
Inspection Date: 12/13/01 Last Inspection: 5/10/00
Status: LQG Type of Inspection: CEI
Inspector(s): Brad Murphy, LOMS
Present at Inspection:
Type of Business: Operator as a bulk storage facility for fuels destined for
Wastes Generated: distribution.

Manifests: Approved Transporters? Yes Approved TSD? Yes
Filled Out Correctly? Yes Signed Copies? Yes
LDR Notification Attached? Yes, for all shipments
Manifests in good order

Waste Minimization: Onsite.

Inspection Records:
Evidence that inspections are conducted: Yes, documented weekly
Inspections on Storage Area: Yes, when containers are in storage.
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? Includes emergency coordinators, home phone numbers. Need home addresses.
Includes evacuation emergency equipment lists, included on map. Evac routes on facility map. Facility manned 24/7, someone always will have list of home addresses.
Contingency Plan Implemented? No (If yes, was it adequate?)

Agreements with Emergency Responders? Yes.

Training Records:
Certified Training Documents Available? Yes, have employees trained.
New Employees Since Last Inspection? Trained 10/01
Evidence of Improper/Inadequate Training? No

Employee Interviews:
Name(s): Trained?

Annual Report Submitted? 2/2/00

Wastestreams:

0001/0018 - HW Solid (benzene, gasoline)

0008/0018 - HW Solid (benzene) (lead)

Transportes:

Tri-state Motor Transit - MOD 095 038 998

TSDs:

ENSCO - MOD 069 748 192



Page Two - RCRA Inspection Report

Facility Name: Exxon Terminal

EPA ID#: NEC 056 478 506

Inspection Date: 12/13/01

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Yes

Internal Communications or Alarm Present? Two-way radios, carried by all personnel. Alarm on tanks (high-level)

Portable Fire Extinguishers and/or Fire Control Equipment? Portable located throughout facility.

Spill Control Equipment: Limited, facility only accumulates solids. Has absorbent pads, boom & PPE

Adequate Water Volume, Foam Equipment or Auto Sprinklers? None. Foam & water sprinklers on fill rack.

All Equipment/Alarms Tested and Maintained? Yes, extinguishers annually and tank alarms weekly every 5 days.

All Personnel Handling HW have Access to Alarm/Device? Yes, two-way radios

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s):

Location(s): See reverse

Satellite Containers: Closed? Yes

Labeled/Contents Identified? Yes

< 55 Gallons? Yes

Releases? No.

Storage Area(s):

Description(s): See reverse

Containers: Closed? Yes Aisle Space? Yes Labeled? Yes

Dated? Yes Evidence of Release? No

< 90 Days? Yes Good Condition? Yes

Other HW Units: (Applicable Regulations)

Description of Unit: N/A

External Facility Condition: Good condition.

Accumulation:

① VPU Area - 1-55 galles container Labeled & closed. Good condition

② maintenance - 1-55 galles container Labeled & closed. Good condition

Storage:

No containers in storage.

Page Three - RCRA Inspection Report

Facility Name: Exxon Terminal

EPA ID#: NCD 056

Inspection Date: 12/13/01

Site Deficiencies:

- ~~① Name addresses for an workbooks list~~
- ~~② Job descriptions for employees~~

No violations noted

Recommendations:

- ① Formalize job description for training records.

[Signature] 12/13/01
Inspector (Date)

[Signature] 12/13/01
Facility Contact (Date)

Follow Up Inspection:

Comments: _____

Inspector (Date)

Facility Contact (Date)

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. George Reagan
Exxon Terminal
6801 Freedom Drive
P.O. Box 32
Paw Creek, NC 28130

2. Article Number (Copy from service label)

Z 298 007 368 (0512/00)

PS Form 3811, July 1999

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

George Reagan 5-15-00

C. Signature

X George Reagan Agent Addressee

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Domestic Return Receipt

102595-99-M-1789

Z 298 007 368

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Mr. George Reagan	
Street & Number	
6801 Freedom Drive	
Post Office, State, & ZIP Code	
Paw Creek, NC 28130	
Exxon Terminal	
Postage	
P.O. Box 32	
Certified Fee	
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

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: Exxon Terminal
Location: 6801 Freedom Drive, Charlotte, N.C. 28208
Mailing Address: P.O. Box 82, Paw Creek, N.C. 28130
EPA ID#: NCD 056 478 506 Phone Number: 704-399-5696
Contact/Title: George Reagan - Foreman
Inspection Date: May 10, 2000 Last Inspection: April 16, 1998
Status: LOG Type of Inspection: CEI
Inspector(s): Joseph Parker - Waste Management Specialist
Present at Inspection: Denton Holyfield - Terminal Mechanic,
George Reagan - Foreman (by telephone)

Type of Business: Exxon Terminal operates as a bulk storage facility for fuels destined for distribution.

Wastes Generated: Since the last inspection: Asbestos removal - 1 container, D018 - Separator Sludge 4 containers on 08/10/98. All PCW is shipped back to their Baton Rouge facility for recycling.

Manifests: Approved Transporters ? Yes Approved TSDF ? Yes
Filled Out Correctly ? Yes Signed Copies ? Yes
LDR Notification Attached ? Yes

Transporters: Tri-State Motor Transit Co.- MOD 095 038 998

TSD's: EnSCO, Inc. - ARD 069 748 192

The facility's only hazardous waste manifest was found in good order.

Waste Minimization: The facility ships their off-spec. product oil/water mixture back to their Baton Rouge refinery.

Inspection Records:

Evidence that inspections are conducted: Yes, documented
Inspections on Storage Area: Yes, weekly
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? No changes to the core hazardous waste contingency plan have been made since the last inspection.

Contingency Plan Implemented? No (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documented

Page Two - RCRA Inspection Report

Facility Name: Exxon Terminal

EPA ID#: NCD 056 478 506 Inspection Date: May 10, 2000

Training Records:

Certified Training Documents Available? Hazardous waste training was conducted on 07/02/99, Emergency Response Training conducted on 09/14/99.

New Employees Since Last Inspection? No

Evidence of Improper/Inadequate Training? Good Training

Annual Report Submitted? Yes, corporate submitted report

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Yes

Internal Communications or Alarm Present? High level alarms on tanks, off spec. Oil/water UST - audio and visual alarms

Portable Fire Extinguishers and/or Fire Control Equipment? Fire extinguishers - 62 hand held, 2 100 lbs. wheeled units, foam system on rack where trucks fill up, 5 fire blankets.

Spill Control Equipment: The facility has absorbent pads, booms, and PPE, etc..

Adequate Water Volume, Foam Equipment or Auto Sprinklers? Foam on the rack - in combination with water sprinklers

All Equipment/Alarms Tested and Maintained? Yes, high level alarms - every 5 days, others - weekly and monthly, Fire extinguishers - annually

All Personnel Handling HW have Access to Alarm/Device? Yes, telephones at the facility, hand held radios also

Adequate Aisle Space in Areas of Facility Operation? Good

Satellite Accumulation Area(s): 2

Location(s): The facility has 2 satellite accumulation areas:

(1) Vapor recovery unit - 1-55 gallon container holding petroleum contaminated absorbent(D001, D018). IN COMPLIANCE.

(2) Building #3 - 1-55 gallon container holding petroleum contaminated absorbent(D001, D018) - IN COMPLIANCE

Satellite Containers: Closed? Yes

Labeled/Contents Identified? Yes

< 55 Gallons? Yes

Releases? No

Page Two - RCRA Inspection Report

Facility Name: Exxon Terminal

EPA ID#: NCD 056 478 506 Inspection Date: May 10, 2000

Storage Area(s): 1

Description(s): The facility has 1 - 90 day storage area located at Building #3. During the inspection, no hazardous waste was in storage.

Containers: Closed? N/A Aisle Space? N/A Labeled? N/A
Dated? N/A Evidence of Release? No
< 90 Days? N/A Good Condition? N/A

Other HW Units: (Applicable Regulations)

Description of Unit: N/A

External Facility Condition: Good

Site Deficiencies:

No Violations. The facility is in compliance with the Large Quantity Generator requirements.

[Signature] 5-12-2000
Inspector (Date)

(CERTIFIED MAIL)
Facility Contact (Date)

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: EXXON TERMINAL
Location: 6801 FREEDOM DRIVE, CHARLOTTE, N.C. 28208
Mailing Address: P.O. Box 82, PAW CREEK, N.C. 28130
EPA ID#: NCD 056 478 506 Phone Number: 704-399-5696
Contact/Title: George REAGAN - FOREMAN
Inspection Date: MAY 10, 2000 Last Inspection: April 16, 1998
Status: LOG Type of Inspection: CEI
Inspector(s): JOSEPH PARKER - NCDENR HAZ. WASTE SECTION
Present at Inspection: Denton Holyfield - Terminal Mechanic, George Reagan - Phone
Type of Business: FUELS TERMINAL
Wastes Generated: Asbestos - Non-Haz. 1 Dr. Separator Sludge 4 Dr. AUL (8/10/98) -
PCW - is shipped back to Baton Rouge facility for recycling.

DD18

Manifests: Approved Transporters ? Filled Out Correctly ? LDR Notification Attached ?

Facility has not had to perform any tank maintenance since last inspection

Waste Minimization:

Inspection Records:

Evidence that inspections are conducted: YES - Good documentation
Inspections on Storage Area: Inspections are conducted weekly
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? NO CHANGES TO CORE HAZ. WASTE CONT. PLAN

Contingency Plan Implemented? NO (If yes, was it adequate?)

Agreements with Emergency Responders? YES

Training Records:

Certified Training Documents Available? TRAINING HAZWOP 3-2-2000,
New Employees Since Last Inspection?
Evidence of Improper/Inadequate Training? GOOD

Employee Interviews:

Name(s): Trained? 9.14.99 - EM. RESP. TRAINING 7-2-99 - HAZ WASTE - CORP.

Annual Report Submitted? Composite Submitted report

TSD

TSD

Page Two - RCRA Inspection Report

Facility Name: EXXON TERMINAL

EPA ID#: NLD 05b 478 506 Inspection Date: MAY 10, 2000

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? NONE

Internal Communications or Alarm Present? High level Alarms on tanks, OFF SPEC. OIL/WATER UNIT - Audio/visual Alarms

Portable Fire Extinguishers and/or Fire Control Equipment? Fire Extinguishers - 62, 2-100 lb wheeled units, foam system on rack, fire blankets

Spill Control Equipment: Spill trailer w/ absorbent pads, booms, PPE No spill trailer

Adequate Water Volume, Foam Equipment or Auto Sprinklers? Foam on rack - in combination with water sprinklers

All Equipment/Alarms Tested and Maintained? High level Alarms - every 5 days, others - weekly/monthly, Fire Extinguishers - annually

All Personnel Handling HW have Access to Alarm/Device? Telephones and hand held radios onsite

Adequate Aisle Space in Areas of Facility Operation? GOOD

Satellite Accumulation Area(s): 2

Location(s): Vapor Recovery Unit - 1-55 gal. - Petro. Contam. Absorbent - GOOD

Building 3 - 1-55 gal. Petro. Contam. Absorbent - GOOD

Satellite Containers: Closed?

Labeled/Contents Identified?

< 55 Gallons?

Releases? NONE

Storage Area(s): 1

Description(s): Building 3 - NO HAZARDOUS WASTE IN STORAGE

Containers: Closed? Aisle Space? Labeled?

Dated? Evidence of Release?

< 90 Days? Good Condition?

Other HW Units: (Applicable Regulations)

Description of Unit: _____

External Facility Condition: _____

Page Three - RCRA Inspection Report

Facility Name: EXCER TERMINAL

EPA ID#: NC0 056 478 506 Inspection Date: MAY 10, 2000

Site Deficiencies: _____

Recommendations: _____

Inspector (Date)

Facility Contact (Date)

Follow Up Inspection:

Comments: _____

Inspector (Date)

Facility Contact (Date)

Joe.

Are these people exempt?
We show them as large.

if so why FC + GM form.

Jim -

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Exxon Charlotte Terminal

EPA ID NO: N C D 0 5 6 4 7 8 5 0 6

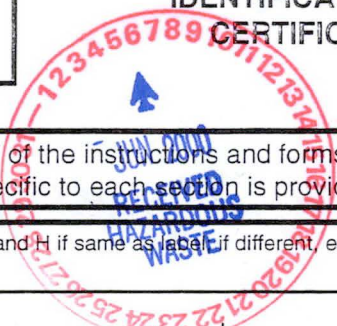


U.S. ENVIRONMENTAL PROTECTION AGENCY

1999 Hazardous Waste Report

FORM IC

IDENTIFICATION AND CERTIFICATION



Instructions: Please see the detailed instructions beginning on page 7 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each section is provided below.

Sec. I Site name and location address. Check the box in items A, B, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instructions page 7.

A. EPA ID No. Same as label or → N C D 0 5 6 4 7 8 5 0 6

B. County Same as label or → Mecklenburg

C. Site/company name Same as label or → Exxon Terminal # 4116

D. Has the site name associated with this EPA ID changed since 1997? 1 Yes 2 No

E. Street name and number. If not applicable, enter industrial park, building name, or other physical location description. Same as label or → 6801 Freedom Drive

F. City, town, village Same as label or → Charlotte

G. State Same as label or → N C

H. Zip Code Same as label or → 2 8 2 0 8 - _____

Sec. II Mailing address of site. Instructions page 7.

A. Is the mailing address the same as the location address? Yes (SKIP TO SEC. III) 2 No (CONTINUE TO BOX B)

B. Number and street name of mailing address _____

C. City, town, village _____

D. State _____

E. Zip Code _____ - _____

Sec. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instructions page 7.

A. Last Name Gaston First name Robert M.I. E.

B. Title Terminal Superintendent

C. Telephone Number 7 0 4 3 9 9 - 5 6 9 6
Extension _____

Sec. IV "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 under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations." Instructions page 8.

A. Last Name Giffin First name Steven M.I. D.

B. Title Environmental Advisor

C. Signature

D. Date of signature 0 2 0 2 0 0
Month Day Year

COPY

EPA ID NO. NCD 056 478 506

Sec. V Generator status. Instructions begin on page 8.	
A. 1999 RCRA generator status (CHECK ONE BOX BELOW) <input type="checkbox"/> 1 LQG <input type="checkbox"/> 2 SQG <input checked="" type="checkbox"/> 3 CESQG <input type="checkbox"/> 4 Non-generator (CONTINUE TO BOX B)	B. Reason for not generating (CHECK ALL THAT APPLY) <input type="checkbox"/> 1 Never generated <input type="checkbox"/> 2 Out of business <input type="checkbox"/> 3 Only excluded or delisted waste <input type="checkbox"/> 4 Only non-hazardous waste <input type="checkbox"/> 5 Periodic or occasional generator <input type="checkbox"/> 6 Waste minimization activity <input type="checkbox"/> 7 Other (SPECIFY IN COMMENTS BOX BELOW)

Sec. VI On-site waste management status. Instructions page 10.	
A. Storage subject to RCRA permitting requirements <div style="text-align: center;"><u>1</u></div>	B. Treatment, disposal, or recycling subject to RCRA permitting requirements <div style="text-align: center;"><u>1</u></div>

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Exxon Charlotte Terminal

EPA ID NO: NCID 056478506



U.S. ENVIRONMENTAL PROTECTION AGENCY

1999 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I A. Waste description (page 12) <u>Used sorbent pads containing gasoline</u>					
B. EPA hazardous waste code (page 12) <u>D10011 D1018</u> <u>NA NA NA</u>			C. State hazardous waste code (page 13) _____		
D. SIC code (page 13) <u>5171</u>	E. Origin code (page 13) System Type <u>1</u> <u>M</u>	F. Source code (page 14) <u>A53</u>	G. Point of measurement (p. 14) <u>1</u>	H. Form code (page 14) <u>B310</u>	I. RCRA-radioactive mixed (page 14) <u>2</u>

Sec. II A. Quantity generated in 1999 (page 15) <u>1000.0</u>	B. UOM (page 15) Density <u>1</u> <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg	C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) <input type="checkbox"/> 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. III)
--	--	--

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site process system type (page 16) <u>M</u>	Quantity treated, disposed, or recycled on site in 1999 (page 16) _____	On-site process system type (page 16) <u>M</u>	Quantity treated, disposed, or recycled on site in 1999 (page 16) _____

Sec. III A. Was any of this waste shipped off site in 1999 for treatment, disposal, or recycling? (page 17) <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input checked="" type="checkbox"/> 2 No (FORM IS COMPLETE)				
Site 1 B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>M</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1999 (page 17) _____	
Site 2 B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>M</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1999 (page 17) _____	
Site 3 B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>M</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1999 (page 17) _____	

Comments:
Sec II, Box A: Estimated quantity.

Region 4 Compliance Data Entry Form - Side A

(Rev.8/97)

FACILITY INFORMATION:	Submittal Information	Initial By- Date -	Corrected By- Date -
	EPA ID Number: <u>NC0056478506</u>	RCRA Comp. Section: Received: Entered/ Returned:	___ / ___ / ___ ___ / ___ / ___ ___ / ___ / ___

Facility Name: EXXON TERMINAL City: CHARLOTTE

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: 5 Date: Mo. 04 / Day 16 / Year 98 Type: CEI Control Number _____
 Data Entry Personnel _____
 Person: 029 Reason:

Evaluation Comments:
 (74) 1 : NO VIOLATIONS- FACILITY IS IN COMPLIANCE
 2 : _____

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) _____ Date of determination: _____
 - a SNC (SNY evaluation)
 or - no longer a SNC (SNN eval.) Same as above eval.: - or - / /

VIOLATION DATA: New: Change: Delete:

_____ Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: / / -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: / / -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: / / -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Continue violation date on Side B if necessary -

*** EPA Region 4 Compliance Data Entry Form -Side B *** (8/97)

Fill out facility information on Side A, then come back to this side.

ENFORCEMENT DATA: New: Change: Delete: (==: Required)

Agency: Type: Date: / / Month Day Year Seq.# (Data Entry)

Person: Branch: Poll. Prev. Measures:

Penalty Data
 Proposed: \$ / / 1) Payments: \$ / / Date Paid: / /
 Settled/Final: \$ / / 2) \$ / /

Enforcement Comments: 1: _____
 (74)
 2: _____

Cite violations addressed by this action below -

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

More violations for this enforcement action on other side ? Yes No

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: Exxon Terminal
Location: 6801 Freedom Drive, Charlotte, N.C. 28208
Mailing Address: P.O. Box 82, Paw Creek, N.C. 28130
EPA ID#: NCD 056 478 506 Phone Number: 704-399-5696
Contact/Title: George Reagan - Foreman
Inspection Date: April 16, 1998 Last Inspection: Nov. 27, 1995
Status: LOG Type of Inspection: CEI
Inspector(s): Joseph Parker - Waste Management Specialist
Present at Inspection: George Reagan - Foreman
Type of Business: Exxon Terminal operates as a bulk storage facility for fuels destined for distribution.
Wastes Generated: D001, D018 - hazardous waste solid - petroleum contaminated absorbent. D008 - lead contaminated sandblast material. Asbestos removal - 15 containers (1-5-98)

Manifests: Approved Transporters ? Yes Approved TSDF ? Yes
Filled Out Correctly ? Yes Signed Copies ? Yes
LDR Notification Attached ? Yes

Transporters: Laidlaw Environmental Services
SCD 987 574 647
Tri-State Motor Transit Co.
MOD 095 038 998

TSD's: Laidlaw Environmental Services
SCD 070 325 985
Ensco, Inc.
ARD 069 748 192

The facilitys hazardous waste manifests were in good order.

Waste Minimization: The facility ships their off-spec. product oil/water mixture back to their Baton Rouge refinery.

Inspection Records:

Evidence that inspections are conducted: Yes, documented
Inspections on Storage Area: Yes, weekly
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, Robert Gaston - Emergency Coordinator
Contingency Plan Implemented? No (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documented

Page Two - RCRA Inspection Report

Facility Name: Exxon Terminal
EPA ID#: NCD 056 478 506
Inspection Date: April 16, 1998

Training Records:

Certified Training Documents Available? Yes, good documentation
New Employees Since Last Inspection? No
Evidence of Improper/Inadequate Training? No

Annual Report Submitted? Yes, corporate submitted report

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Yes

Internal Communications or Alarm Present? High level alarms on tanks, offspec. Oil/water UST - audio and visual alarms

Portable Fire Extinguishers and/or Fire Control Equipment? Fire extinguishers - 62 hand held, 2 100 lbs. wheeled units, foam system on rack where trucks fill up, 5 fire blankets.

Spill Control Equipment: Spill trailer located at the facility that contains absorbent pads, booms, and PPE, etc..

Adequate Water Volume, Foam Equipment or Auto Sprinklers? Foam on the rack - in combination with water sprinklers

All Equipment/Alarms Tested and Maintained? Yes, high level alarms - every 5 days, others - weekly and monthly, Fire extinguishers - annually

All Personnel Handling HW have Access to Alarm/Device? Yes, telephones at the facility, hand held radios also

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): 2

Location(s): The facility has 2 satellite accumulation areas:
(1) Vapor recovery unit - 1-55 gallon container holding petroleum contaminated absorbent. IN COMPLIANCE.
(2) Building #3 - 1-55 gallon container holding petroleum contaminated absorbent - IN COMPLIANCE

Satellite Containers: Closed? Yes
Labeled/Contents Identified? Yes
< 55 Gallons? Yes
Releases? No

Storage Area(s): 1

Description(s): The facility has 1 - 90 day storage area located at Building #3. During the inspection, no hazardous waste was in storage.

Page Three - RCRA Inspection Report

Facility Name: Exxon Terminal

EPA ID#: NCD 056 478 506

Inspection Date: April 16, 1998


Containers: Closed? N/A Aisle Space? N/A Labeled? N/A
Dated? N/A Evidence of Release? No
< 90 Days? N/A Good Condition? N/A

Other HW Units: (Applicable Regulations)

Description of Unit: N/A

External Facility Condition: Good

Site Deficiencies: NO VIOLATIONS. The facility is in compliance with the large quantity generator requirements.

 4-20-98
Inspector (Date)

(CERTIFIED MAIL)
Facility Contact (Date)

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: Exxon Terminal
Location: 6801 FREEDOM DRIVE, CHARLOTTE, N.C. 28208
Mailing Address: P.O. Box 82, PAW CREEK, N.C. 28130
EPA ID#: NCD 056 47B 506 Phone Number: 704-399-5696
Contact/Title: GEORGE REAGAN - FOREMAN
Inspection Date: April 16, 1998 Last Inspection: Nov. 27, 1995
Status: LQG Type of Inspection: CEI
Inspector(s): JOSEPH S. PARKER - WMS
Present at Inspection: GEORGE REAGAN - Exxon
Type of Business: Fuels Terminal
Wastes Generated: DODI, D01B - MAR. WASTE SOLID - Absorbent
Asbestos Removal - 15 Drums 1-5-98
SANDBLAST MATERIAL - 0008 (6-27-97)
Manifests: Approved Transporters? yes Approved TSDF? yes
Filled Out Correctly? yes Signed Copies? yes
LDR Notification Attached? yes
Good Manifests

Waste Minimization: Shipped off-spec product oil/water mixture back to Gator Rouge Refinery.

Inspection Records:
Evidence that inspections are conducted: Yes
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, Robert Gaston - Emery Coordination

Contingency Plan Implemented? NO (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documented

Training Records:
Certified Training Documents Available? Yes - 9-9-97 and 12-15-97
New Employees Since Last Inspection? NO
Evidence of Improper/Inadequate Training? NO

Employee Interviews:
Name(s): Trained?

Annual Report Submitted? Yes, Corporate submitted report

TRANS TSD
TRI-STATE MOTOR TRANSIT CO. ENSCO, INC.
MOD 095 038 998 ARD 069 748 192
LADLAN ENV. SVCS. SCD 987 574 647 SCD 078 325 985

Page Two - RCRA Inspection Report

Facility Name: EJXON TERMINAL
EPA ID#: NCD 056 47B 506
Inspection Date: April 16, 1998

Emergency Preparedness:
Facility Maintained and Operated to Prevent Releases? YES

Internal Communications or Alarm Present? High level alarms on tanks, UST - ^{off spec} Audio & Visual Alarm
Portable Fire Extinguishers and/or Fire Control Equipment? _____

Fire Extinguishers (62), wheeled unit 2-100 lbs units, Foam system on roof

Spill Control Equipment: Pads, Absorbent - spill control trailer, booms, OPE, Fire Blankets (5)
Adequate Water Volume, Foam Equipment or Auto Sprinklers? _____

Foam on roof - combination w/ water sprinklers

All Equipment/Alarms Tested and Maintained? YES, High level - 5 days, Other - Monthly, Weekly

All Personnel Handling HW have Access to Alarm/Device? _____

Radios - hand held, telephones on facility -

Adequate Aisle Space in Areas of Facility Operation? YES

Agreements with Emergency Responders? YES, documented

Satellite Accumulation Area(s): 2

Location(s): _____

① Vapor Recovery Unit - 1-55 gallon - in compliance

② Building #3 - 1-55 gallon containers - in compliance

Satellite Containers: Closed? yes

Labeled/Contents Identified? yes

< 55 Gallons? yes

Releases? NO

Storage Area(s): 1

Description(s): In front of Building #3 - No H.W. in storage at time of inspection - in compliance

Containers: Closed? yes n/a Aisle Space? yes Labeled? n/a

Dated? n/a Evidence of Release? NO

< 90 Days? n/a Good Condition? NO

Other HW Units: (Applicable Regulations)

Description of Unit: N/A

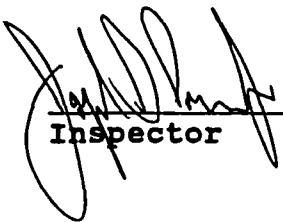
External Facility Condition: GOOD

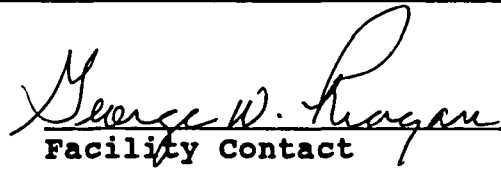
Page Three - RCRA Inspection Report

Facility Name: EXXON TERMINAL
EPA ID#: NCD 056 47B 506
Inspection Date: April 16, 1998

Site Deficiencies: No Violations - Facility is in compliance.

Recommendations: ① facility has a good program for Hazardous Waste Management.

 4-16-98
Inspector (Date)

 4/16/98
Facility Contact (Date)

Follow Up Inspection:

Comments: _____

Inspector (Date)

Facility Contact (Date)

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

SITE SAFETY PLAN (SSP) UPDATE FORM
(Regulated Facility)

(A) Facility Name: EXXON TERMINAL EPA ID# NCD 056 478 506
Address: 6801 FREEDOM DRIVE, CHARLOTTE, N.C. 28208 Phone# 704-399-5696
Contact: GEORGE REAGAN Phone# _____
Facility Safety Designee: _____
HWSS Staff: JOSEPH S. PANKEN - WMS Date: April 15, 1978

(B) REVIEW AND CHANGES

SSP Reviewed: SSP Changed: (1) SSP Unchanged:

Comments: COMPLIANCE EVALUATION INSPECTION

(1) NOTE: Any changes made in the facility process descriptions or health and safety considerations section of the SSP must be shown on a new SSP.

(C) EMERGENCY INFORMATION

Ambulance: _____ Telephone# _____
Hospital: UNIVERSITY HOSPITAL + MED. PARK Telephone# 911
Police: CHARLOTTE POLICE DEPT. Telephone# 911
Fire Dept.: CHARLOTTE FIRE DEPT. Telephone# 911
Fire & Emergency Signals Reviewed: YES
Site Evacuation Plan Reviewed: YES

SAFETY OFFICER: _____ DATE: _____

EPA ID: NCDO56478506

DATA ENTRY PERSONNEL	
Submitted by: _____	Date: _____
Entered by: _____	Date: _____

Facility Name: Exxon Terminal

City: Raw Creek, N.C. 28130

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: Date: Mo / Day / Year

Type:

Control Number Data Entry Personnel									

Person: BRANCH REASON

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D: Del.)

Generators	
GBF	
GER	E
GGR	E
GLB	E
GMR	E
GOR	E
GPT	E
GRR	E
GSC	
GSO	

Transporters	
TGR	
TMR	
TOR	
TAR	
TWD	

TSD's		
DBF		
DCH		
DCL		
DCP		
DFR		
DGS		
DGH		
DIN		
DLB		
DLF		
DLT		
DHC		
DHR		
DOR		
DOT		
DPP		
DSI		
DTR		
DTT		
DWP		

USED OIL	
TUO	
TFO	
BUO	
MUO	
PUO	
RUO	

COMPLIANCE SCHEDULE (TSD, GEN, TRANS.)			
FEA		CAS	

Evaluation Comments: (72) 1 :

2 : No violations noted

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (ndy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (ndy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (ndy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data if necessary -

RCRA INSPECTION REPORT

(x= violation, na= not applicable)

General Information:

Facility Name Exxon Terminal
Location 6801 Freedom Dr. Charlotte, N.C. 28208
Mailing Address P.O. Bx 82 Fox Creek, N.C. 28130
EPA I.D.# NCD 056 478 506 Phone # (704) 399-5696 / FAX 399-4100
Contact/ Title Mr. Arnold Tinsdale, Mr. George Reason
Inspection Date 27 November 1995 Last Inspection 18 April 1994
Status LOG Type of Inspection CEI
Waste Management Specialist(s) Mr. Robin B. Hedden
Present at Inspection Mr. George Reason
Type of Business Fuels Terminal
Waste Generated D001, D018

Manifests:

Approved Transporters? Yes Approved TSD's? Yes
Signed Copies? Yes Filled Out Correctly? Yes
LDR Notification Attached? Yes

Waste Minimization? _____ How? _____

Hazardous Waste Inspection Records:

Inspections On Storage Area Yes
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? 25 May 1995
Contingency Plan used? Yes, drill (if yes, was it adequate?) Yes
Agreements with Emergency Responders? Corporate perami mailed copies

Training Records:

Certified Training Documents Available? Yes
Any New Employees Since Last Review? No
Evidence Of Improper/ Inadequate Training? No

Facility Name Exxon Terminal EPA ID # NCD 056 478 506
Inspection Date 27 NOV 95

Employee Interview:

Names(s) _____ Trained _____

Annual Report Submitted? yes Copy At Facility? yes

Emergency Preparedness:

Facility Maintained And Operated To Prevent Releases? yes

Internal Communications Or Alarm Present? yes

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? yes

All Equipment/ Alarms Tested And Maintained? Monthly

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) Vapor recovery, Storage unit
2, one @ each area

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

Storage Area(s): 1 Description Storage unit
None

Containers: Closed? Aisle space? Labeled? Releases? NA

Dated? NA <90 days? Good condition? NA

Other H.W. Units: (Applicable Regulations)

Description of Unit None

External Facility Condition clean good

Facility Name Exxon Terminal

EPA I.D.# NCD 056 478 506

Inspection Date 27 Nov 95

Site Deficiencies:

- 1.) 40 CFR None
- 2.) 40 CFR _____
- 3.) 40 CFR _____
- 4.) 40 CFR _____
- 5.) 40 CFR _____
- 6.) 40 CFR _____

Recommendations/ Violations Continued: None

R. R. Hobbs 27 Nov 95
RCRA Inspector (date)

George W. Ragan 11/27/95
Facility Contact (date)

Follow Up Inspection:

Comments _____

RCRA Inspector (date)

Facility Contact (date)

Region IV CM&E Form - Side A

EPA ID: N C D O 5 6 4 7 8 5 0 6

DATA ENTRY PERSONNEL

Submitted by: _____ Date: _____

Entered by: _____ Date: _____

Facility Name: Exxon Terminal - Paw Creek Terminal City: Charlotte

EVALUATION DATA: New: _____ Change: _____ Delete: _____ (← : Required)

Agency: S Date: Mo 04 / Day 18 / Year 94

Type W M E

Control Number Data Entry Personnel

Person: 010 BRANCH 01 REASON

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators

GBF	
GER	E
GGR	E
GLB	E
GMR	E
GOR	E
GPT	E
GRR	E
GSC	
GSO	

Transporters

TGR	
TMR	
TOR	
TAR	
TND	

USED OIL

TUO	
TFO	
BUO	
MUO	
PUO	
RUO	

TSD's

DBF		DLB		DPB	
DCH		DLF		DPP	
DCL		DLT		DSI	
DCP		DLC		DTR	
DFR		DHC		DTT	
DGS		DMR		DWP	
DGH		DOR			
DIN		DOT			

COMPLIANCE SCHEDULE (TSD, GEN, TRANS.)
FEA CAS

Evaluation Comments: (72) 1 :

2 : No Violations noted!

VIOLATION DATA: New: _____ Change: _____ Delete: _____

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: Scheduled Actual /
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: Scheduled Actual /
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: Scheduled Actual /
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Continue violation data if necessary -

WASTE MINIMIZATION CHECKLIST

Date: 18 April 1994

Facility Name: Exxon Terminal

Facility Address: Hwy 27 Freedom Dr. 10801
Charlotte, N.C.

Facility ID#: NCD 056 478 506

Facility Contact: Gerald B. Truesdale, Jr

Waste Min. Coordinator: Gerald Truesdale, Jr

Written policy in place Yes

Designated reduction goals per wastestream To Reduce

Tracking waste generation : type, rates, dates, amounts We Track

Type dates & amounts

Established true costs of generation per wastestream _____

yes we know how much it cost

Technology transfer Hire consultants to review processes & make recommendations.

Employee input yes - we Ask Employees how to min. Waste

Evaluate a representative wastestream and complete the following:

Wastestream selected: Solvents

Has each source been evaluated for? (Explain)

Chemical substitutions: We switched to Recyclable Solvents
NOW we are looking at Citrus Solvents

Product changes: N/A

Process changes: N/A

Equipment changes: N/A

Operational changes: N/A

Has each point in the process been identified where materials can be prevented from becoming wastes? yes

Are the true costs of waste management being allocated back to the activities responsible for generating it? yes

Comments: _____

RCRA INSPECTION REPORT

X=violation noted; NA=not applicable

Facility Name: Exxon Terminal
Location: 6801 Freedom Dr. Charlotte, N.C. 28208
Mailing Address: PO Bx 82 Paw Creek, N.C. 28130
ID#: NCD OSlc 478 506 Phone Number: (904) 399-5696
Contact/Title: Frank Thacker Gerald Truesdale
Inspection Date: 18 April 1994 Last Inspection: 1 June 1993
Status: LOG Type of Inspection: WMI / CEI
Inspector(s): Robin B. Hedden
Present at Inspection: Gerald Truesdale, George Reagon
Type of Business: Fuels Terminal
Waste Generated: DO18 (Benzene)

Manifests:

Approved Transporters? OK Approved TSD's? OK
Signed Copies? OK Filled Out Correctly? OK
LDR Notification Attached? OK

Waste Minimization: Written policy

Inspection Records: OK

Evidence That Inspections Are Conducted: OK

Contingency Plan:

On Site? yes
Any Changes To Facility/Processes Or Emergency Coordinator Since
Last Review? 29 Oct 1993
Contingency Plan used? yes 22 Jul 93 (if yes, was it adequate?) yes

Training Records:

Certified Training Documents Available? yes
Any New Employees Since Last Review? yes: Tom Weber
Evidence Of Improper/Inadequate Training? No evidence of improper training

Facility Name: Saxon Terminal - Paw Creek
ID #: NCD 0516 478 506 Inspection Date: 18 April 1994

Employee interviews:
Name(s): _____ Trained? _____

Annual Report Submitted? OK

Emergency Preparedness:

Facility Maintained And Operated To Prevent Releases? yes
Internal Communications Or Alarm Present? yes Radio
Device In Area Of Operation To Summon Outside Aid? yes phone
Portable Fire Extinguishers And/Or Fire Control Equipment? yes
Spill Control Equipment? yes
Adequate Water Volume, Foam, Equipment, Or Auto Sprinklers? yes
All Equipment/Alarms Tested And Maintained? yes
All Personnel Handling HW Have Access To Alarm/Device? yes
Aisle Space In Areas Of Facility Operations? OK
Agreements With Emergency Responders? OK

Satellite Accumulation Area(s): 2 Location(s): 1-VRU, 2-Shop

Containers: Closed? no
Labeled? no
< 55 gallons? yes

Storage Areas: Description: shop bldg, no containers

Containers: Closed? N/A Aisle Space? N/A
Labeled? N/A Evidence Of Release? N/A
Dated? N/A < 90 Days? N/A
Good Condition? N/A

Other HW Units: (Applicable Regulations)
Description Of Unit: _____

External Facility Condition: _____

Facility Name: Gycon Terminal - Poir Creek
ID #: NCD 056 478 506 Inspection Date: 18 April 1994

Site Deficiencies: _____

- 1).40 CFR _____
- 2).40 CFR _____
- 3).40 CFR _____
- 4).40 CFR _____
- 5).40 CFR _____
- 6).40 CFR _____
- 7).40 CFR _____

No violations noted

19 April 94

R. B. Held

CONTACT:

X Gerald G. Innesdale

RCRA INSPECTION FIELD NOTES- GENERATOR

C = copies made; * = violation; P = photo taken

Facility Name: Exxon Terminal
Address: Hwy 27 Freedom Drive
ID #: NCD 0816 478 506
Inspection Date: 18 April 1994
Last Inspection: June 93
Contact: Jerry Thacker / George Genald Truesdale
Type of Inspection: WMI / CEI
Present at Inspection: R. Jordan

Type of business: Fuels Terminal
Processes:
Wastes Generated: D018 (Benzene) - 5ppm

Transporters: DART TRUCKING Co. (OHD 009 863 825) TSD's ThermalKEM Inc. (SCD044 442 333)

Manifests: OK
Signed Copies? OK Filled out correctly? OK
Treatment Standards? OK
94001

Inspection Records: OK

Contingency Plan:
Actions for spills/fires? OK Agreements with emergency contacts? OK
Em. coords updated? yes Name, address, phone for em. coords? OK
Emerg equip/location/alarms? OK Report on use of conting. plan? yes / 22 July 93
Evacuation plan/signals/primary/secondary? OK
Prim: Gerald Truesdale
Alt: George Beagon
Plan updated on 29 Oct 1993

Training Records:
Last training? 11 Dec 92 Em coord.s and appropriate people trained? OK
Job Title? OK, there is Job description? OK, there is T. Wilson
Content? OK, T. Wilson Sign off? OK
G.T., G.R., Tom Wilson

Annual Report: OK
Waste analysis (TCLP): Copied ThermalKEM I DR for manifest 94001
Accumulation Areas: Description: 2 drums

Closed/labeled/dated/< 55 gallons? OK
Storage Areas: Description: No drums

Closed/labeled/dated/< 90 days/good condition? N/A

Violations are:
Class II (NOV)
Class I (FILL OUT COMPLIANCE ORDER FORM).



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. NCDD05647850694001	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 EXXON CO. U.S.A. P.O. BOX 82 PAW CREEK, N.C. 28130				A. State Manifest Document Number		
4. Generator's Phone (704) 399-5696				B. State Generator's ID		
5. Transporter 1 Company Name DART TRUCKING CO. INC		6. U.S. EPA ID Number OHDD009865825		C. State Transporter's ID		
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone 800-541-8206		
9. Designated Facility Name and Site Address ThermaKEM Inc. 2324 Vernesdale Road Rock Hill, SC 29730		10. U.S. EPA ID Number SCD044442333		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 803-324-5310		
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. HAZARDOUS WASTE, SOLID NOS, 9 NA 3077, PG III (Gasoline Contaminated Absorbent).				001 DM	200 P	0018
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
a. ST-00012-2362				c. ST- - - - -		
b. ST- - - - -				d. ST- - - - -		
15. Special Handling Instructions and Additional Information 24 Hour Emergency Telephone # 704-399-5696 ER 631 SAN 202810				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 Gerald G. Truesdale			Signature <i>Gerald G. Truesdale</i>		Month Day Year 04.14.94	
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name JAMES E Ober			Signature <i>James E Ober</i>		Month Day Year 04.14.94	
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	

FORM #1
LAND DISPOSAL RESTRICTION FORM

GENERATOR INFORMATION

Generator Name/Location EXXON Co. U.S.A.
6801 Freedom Dr. Charlotte, N.C. 28208
EPA ID Number NCD 056478506 Manifest Number 94001
Waste Analysis Available _____ Yes _____ No On file at facility

B. **UNRESTRICTED WASTE NOTIFICATION (NON-HAZARDOUS):** The waste stream (ST#) or entire waste shipment is non-hazardous (non-regulated) and not banned from land disposal per 40 CFR Part 268; please check (✓) the following notification and list ST#'s impacted.

I notify that I have personally examined and am familiar with the waste through analysis and testing or knowledge of the waste to support this certification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in the 268.32 or RCRA 3004(d)

ST Number 00012-2362 CODE(s): D018
ST Number _____ CODE(s): _____

C. **RESTRICTED WASTE CERTIFICATION:** The waste stream is prohibited from Land Disposal under 40 CFR Part 268, check (✓) the following certification. Please complete Form #2.

_____ I certify that I personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards in 40 CFR 268, Subpart D and must, therefore, be treated to the appropriate regulatory treatment standards prior to land disposal.

D. **DEBRIS CERTIFICATION:** Debris contaminants subject to treatment must be certified as required by 40 CFR 268.7 (a) (4). You can certify the contaminants by indicating the waste codes that apply to the debris waste stream. By indicating the waste codes, the corresponding constituents that apply to the waste code can be certified as contaminants subject to treatment. The specific constituents can be referenced in 40 CFR Part 268.41 Table CCWE and 268.43 Table CCW. Please check (✓) the following statement and list all the hazardous waste codes and therefore, contaminants subject to treatment, that apply to the debris waste stream:

_____ This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45.

E. **VARIANCE NOTIFICATION:** The waste shipment is subject to an exemption from a prohibition or the type of land disposal method utilized for the waste such as a case-by-case extension under 268.5, an exemption under 268.6, or a nation-wide capacity variance under Subpart C, please check (✓) the following statement, list the appropriate variance and date the waste is subject to prohibition.

_____ I notify that I personally have examined and am familiar with the waste through knowledge of the waste to support this certification that the waste is subject to an exemption from a prohibition such as a case-by-case extension under 268.5, national capacity variance under 40 CFR Subpart C or an exemption under 268.6.

Variance: _____ Date waste is subject to prohibitions: _____

F. **LAB PACKS:** The waste shipment is lab packs, use Form #3 and sign Section H of this page.

ThermalKEM New York (Norlite): For waste shipments manifested to ThermalKEM New York (Norlite), please complete and sign Form #1. Complete Form #2. Read and check the certification statement on Form #4.

H. Signature: Gerald G. Truesdale Date: 4-14-94
Print Name: Gerald G Truesdale Title: Term. Supt.

WASTE CHARACTERIZATION FORM

1 Amendment New

Authorization Number: ST - 00012 - 2362 2

Landfill Reclaim
 Recycle Incinerate
 Landfarm Energy Recovery
 Other _____

3 Generator Information:

Generator US EPA ID # NCDO56478506 Generator Name: EXXON CO. U.S.A.

Address 6801 FREEDOM DR. City Charlotte State NC Zip Code 28208

Official Contact G. TRUESDALE Title Supt. Telephone 704-399-5696

SC County (For In-State Generator Only)

4 Broker Information:

Name: _____
Official Contact: _____
Telephone: () _____
Address: _____
City: _____ State: _____ Zip: _____

5 General Waste Information:

DOT Shipping Name: HAZARDOUS WASTE SOLID NOS (Gasoline)
DOT Hazard Class: 9
UN/NA # NA 3077 PG III

6 Physical State:

Powder Sludge Solid Liquid Solid/Liquid Aerosols
 Lab Pack Gas (Cylinder) Other: _____

7 Inorganics Present:

Total Fluorine NS % Total Bromine NS % Cyanide NS %
Nitric Acid NS % Chromic Acid NS % Sulfur NS %
Sodium Hydroxide NS % Potassium Hydroxide NS %

8 Organics Present:

PCB NS ppm Dioxins NS ppm Furans NS ppm

9 Reactivity:

Is waste reactive under 40 CFR 261.23? Yes No

10 **Carcinogens:** Circle if present: arsenic, asbestos, benzene, benzenzene, beryllium, bis (chloromethyl) ether, diethylstilbesterol, 2-naphthylamine, nickel, vinyl chloride, chromium (VI), acrylonitril, cyclophosphamide, 1,2-diphenyl hydrazine, ethylene oxide, melphalan.

11 **Benzene NESHAP Applicability:** Is this waste stream subject to management under National Emission Standards for Benzene Waste Operations as provided in 40 CFR, Part 61, Subpart FF? (See Attachment 1 worksheet for details).

NO YES
Initials: SWR Total Annual Mass of Benzene for this stream _____ Mega Grams

12 Coexistence of Waste Characteristics

Recent regulatory changes mandate determination of all Hazardous Characteristics as defined by 40 CFR 261 Subpart C regardless of whether or not the waste is listed in 40 CFR 261 Subpart D. See Attachment 2 for this determination worksheet. In order to eliminate confusion or delay at the point of waste receipt, include all characteristic codes as determined by this worksheet on Item 8 on Page 1 of the Authorization Request Form (ARF) in addition to any listed waste codes.

Failure to complete this section during the approval process may result in additional analytical testing (TCLP) being required at the time of receipt of the first shipment. The associated costs of any additional analytical testing will be the full responsibility of the generator.

Initials: SWR

13 Biological, Pathological or Etiological Materials:

List any present: _____

14 Authorization To Correct ARF:

I authorize ThermalKEM to make corrections to the attached Authorization Request Form, such corrections being consistent with the results of sample characterization and/or regulatory requirements of South Carolina DHEC. I understand that a corrected copy will be sent to me.

Signature: George W. Reagan Title: Person Date: 3/21/94

15 Certification For Non-Hazardous Waste:

I certify that to the best of my knowledge the information provided hereon is correct, and the waste is non-hazardous by RCRA definition. Non-hazardous wastes do not require shipment approval by South Carolina Department of Solid and Hazardous Waste.

Signature: _____ Title: _____ Date: _____

16 **American NuKEM Representative:** Gregory Code: 109-D
 Rock Hill, SC (803) 329-9690 Mahwah, NJ (201) 817-0900 Southfield, MI (313) 353-5880

17 To Be Completed by ThermalKEM

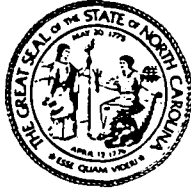
Toxicity Rating:
Ingestion _____ Inhalation _____ Skin Absorption _____
Hazard Rating:
Health _____ Flammability _____ Reactivity _____
Special _____

EVACUATION PLAN

THE EVACUATION PLAN WILL BE IMPLEMENTED UPON HEARING THE HIGH LEVEL ALARM- SOLID BLAST FROM HORN- OR THE FIRE ALARM-BUZZER NOISE AND UPON VERBAL INSTRUCTION FROM THE TERMINAL SUPERINTENDENT OR DESIGNATED PERSON IN CHARGE.

ALL PERSONEL ON THE PROPERTY SHOULD EVACUATE THROUGH THE EXIT GATE AT THE NORTH END OF THE FACILITY. PERSONNEL IN THE DIKE AREA SHOULD MOVE OUT SIDE THE CONTAINMENT WALL IMMEDIATLY AND THEN PROCEED TO THE GATE. THE SAFE HAVEN IS LOCATED OUT SIDE THE FENCE NEAR THE EXXON TERMINAL SIGN. ALL PERSONNEL SHOULD REMAIN AT THE SAFE HAVEN AREA UNTIL INSTRUCTED TO LEAVE, UNLESS IT BECOMES UNSAFE IN WHICH CASE THEY SHOULD MOVE TO THE BRANUM PARKING LOT.

THE ALTERNATE EVACUATION ROUTE IS THROUGH THE GATE AT THE WESTERN END OF THE PROPERTY.(SEE ATTACHED PLOT.)



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

May 21, 1993

EXXON TERMINAL #4116
 PO BOX 82
 PAW CREEK NC 28130

RE: EPA ID No.: NCD056478506

Dear Sir:

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

Your EPA ID number is active.

Current computer record of your facility contains following information:

(X Indicates Operational Status of Your Facility)

- | | |
|-------------------|-------------------------|
| X LARGE GENERATOR | - SMALL QNTY. GENERATOR |
| - TRANSPORTER | - TREATER |
| - STORER | - DISPOSER |

Company Name:	EXXON TERMINAL #4116	
Owner:	EXXON CORPORATION	
Owner Address:	PO BOX 82	
City, St.& ZIP:	PAW CREEK	NC 28130
Contact:	THACKER	JERRY
Phone Number:	(704)399-5696	
Location Addr.:	6801 FREEDOM DRIVE	
City, St.& ZIP:	CHARLOTTE	NC 28208

Please verify the above computer information. Please notify us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status, namely Company's Name, Ownership, Address, Contact, or Telephone.
 Your EPA ID number is currently active.

Sincerely,

P.O. Box 27687, Raleigh, North Carolina 27611-7687 Telephone 919-733-4984 Fax # 919-733-0613
 R.J. Edwards, Administrative Officer
 Division of Solid Waste Management
 An Equal Opportunity Affirmative Action Employer

CC: PHILLIP DELP



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

May 4, 1993

EXXON TERMINAL #4116
 PO BOX 82
 PAW CREEK NC 28130

RE: EPA ID No.: NCD056478506

Dear Sir:

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

Your EPA ID number is active.

Current computer record of your facility contains following information:

(X Indicates Operational Status of Your Facility)

- | | |
|-------------------|-------------------------|
| X LARGE GENERATOR | - SMALL QNTY. GENERATOR |
| - TRANSPORTER | - TREATER |
| - STORER | - DISPOSER |

Company Name:	EXXON TERMINAL #4116
Owner:	EXXON CORPORATION
Owner Address:	PO BOX 82
City, St.& ZIP:	PAW CREEK NC 28130
Contact:	DUNCAN R B
Phone Number:	(704)399-5696
Location Addr.:	HIGHWAY 27
City, St.& ZIP:	PAW CRBEK NC 28130

Please verify the above computer information. Please notify us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status, namely Company's Name, Ownership, Address, Contact, or Telephone.
 Your EPA ID number is currently active.

Sincerely,

R.J. Edwards, Administrative Officer
 P.O. Box 27687, Raleigh, North Carolina 27611-7687 Telephone 919-733-4994 Fax 919-733-0513
 Division of Solid Waste Management

An Equal Opportunity Affirmative Action Employer

CC: PHILLIP DELP

MAY 12 '93 11:15AM CHARLOTTE TERMINAL

EXXON COMPANY, U.S.A.

POST OFFICE BOX 30451 • CHARLOTTE, NORTH CAROLINA 28230-0451

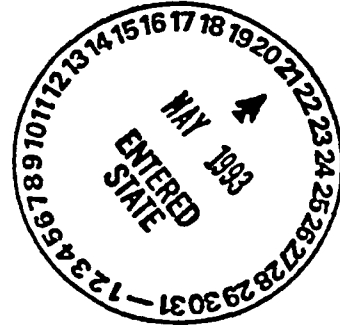
MARKETING - DISTRIBUTION WEST
MIDSOUTH ZONE

J. D. THACKER
ACTING TERMINAL SUPERVISOR
CHARLOTTE TERMINAL
6801 FREEDOM DRIVE
CHARLOTTE, NC 28208



May 12, 1993

Mr. R. J. Edwards
State of North Carolina
Department of Environment, Health and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27617-7687



Re: EPA ID # NCD056478506

Dear Mr. Edwards,

Effective May 1, 1993, the contact person at Exxon Terminal #4116 in Charlotte, North Carolina, changed from Rob Duncan to Jerry Thacker. The correct location address is 6801 Freedom Drive, Charlotte, NC 28208. All other information in your letter of May 4, 1993, is correct. A copy is attached.

Thank you.

Sincerely,

Jerry D. Thacker
Acting Terminal Supervisor

Attachment

EXXON COMPANY, U.S.A.

POST OFFICE BOX 82 • PAW CREEK, NORTH CAROLINA 28130

MARKETING DEPARTMENT


Sept. 3, 1992

Renese Smith
Ensco, Inc.
American Rd.
Eldorado, Arkansas 71730

Dear Renese:

Reference the enclosed copy of a hazardous waste manifest for waste generated at the Exxon Co. USA Charlotte terminal (State document #503957). The EPA has brought it to my attention that this manifest was inadvertently used without a 5 digit manifest document number. This letter is to notify you that I as signature under the generator's name am assigning the number 92001 to this manifest (I have enclosed a copy with this number written in also). Please be absolutely certain that your records reflect this identification change. Please send me a return letter noting that you have completed this process. If you have any questions or require more information please feel free to call me at 704-399-5696.

Yours Truly,


Robert B. Duncan Jr.
Terminal Superintendent
Original Signature under
Generator Certification

.cc Spring Allen - NCDEHNR Asheville
Jesse Wells - Mooresville, N.C.



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

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NC0710516478506	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address EXXON Co., U.S.A. P.O. Box 82 PAW CREEK, NC 28130			A. State Manifest Document Number AR-503957		B. State Generator's ID	
4. Generator's Phone (704) 529-4232			C. State Transporter's ID PC 708 H JR		D. Transporter's Phone 501-863-7173	
5. Transporter 1 Company Name DIVISION TRANSPORT		8. US EPA ID Number 1A81D1069174811912		E. State Transporter's ID PC --- H ---		F. Transporter's Phone
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 ENSCO, INC. AMERICAN RD. EL DORADO, AR 71730			10. US EPA ID Number 1A81D1069174811912		G. State Facility's ID	
					H. Facility's Phone 501-863-7173	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	L. Waste No.
a. RQ WASTE PAINT RELATED MATERIAL FLAMMABLE LIQUID UN1263 ERG #26			0102 DM	11000 P		D001 F003 F005
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above 11a: WMDS 154969 939#			K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: GLENN S. GORMAN 302-695-5510			
If no alternate TSD, return to generator						
15. Special Handling Instructions and Additional Information INVOICE: DUPONT Co. MAILING: c/o GLENN GORMAN ADDRESS: 228 DERRY COURT WILMINGTON, NC 28405			LAND DISPOSAL RESTRICTION NOTIFICATION FORM ATTACHED		ORDER # 83350 LOAD # 68516	
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 Arkansas state 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 x Robert B. DUNKAN		Signature <i>Robert B. Duncan</i>		Month Day Year 10/12/92		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name x Jim Greenwalt		Signature <i>Jim Greenwalt</i>		Month Day Year 10/12/92		
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 Renese Smith						
Signature <i>Renese Smith</i>		Month Day Year 01/28/92				

AR 1-91

GENERATOR

TRANSPORTER

FACILITY

Corrected copy follows



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

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NC0705G4785009126101		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address EXXON Co., U.S.A. P.O. Box 82 PAW CREEK, NC 28130		4. Generator's Phone (704) 529-4232		A. State Manifest Document Number AR 503957		B. State Generator's ID							
5. Transporter 1 Company Name DIVISION TRANSPORT		6. US EPA ID Number IAIRDIOG9174811912		C. State Transporter's ID PC 708 H JQ		D. Transporter's Phone 501-863-7173		E. State Transporter's ID PC H					
7. Transporter 2 Company Name		8. US EPA ID Number		F. Transporter's Phone		G. State Facility's ID		H. Facility's Phone 501-863-7173					
9. Designated Facility Name and Site Address ENSCO, INC. AMERICAN RD. EL DORADO AR 71730		10. US EPA ID Number IAIRDIOG9174811912		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. HQ WASTE PAINT RELATED MATERIAL FLAMMABLE LIQUID UN1263 ERG #26		0102 DM		11000 P		D001 F003 F005			
				b.									
				c.									
				d.									
J. Additional Descriptions for Materials Listed Above 11a: WMD9 154969		K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: GLENN S. GORMAN 302-695-5510		939#									
If no alternate TSDF, return to generator		15. Special Handling Instructions and Additional Information INVOICE DU PONT Co. MAILING: C/O GLENN GORMAN ADDRESS: 228 DERRY COURT WILMINGTON, NC 28405		LAND DISPOSAL RESTRICTION NOTIFICATION FORM ATTACHED		ORDER # 83350		LOAD # 68516					
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 Arkansas state 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 * Robert B. DUNCAN		Signature <i>Robert B. Duncan</i>		Month Day Year 10/12/92							
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name * Jim Greenwait		Signature <i>Jim Greenwait</i>		Month Day Year 10/12/92							
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 Kense Smith		Signature <i>Kense Smith</i>		Month Day Year 01/28/92							

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

Mooresville Regional Office

October 4, 1993

Memorandum To: Mr. Keith Masters
Hazardous Waste Section
Western Area Supervisor

From: Jesse W. Wells
Waste Management Specialist
Mooresville Regional Office

Subject: Exxon Terminal
Paw Creek, Mecklenburg County, N.C.
Re-Grading & Soil Removal Project

Attached is a summary of activities of actions taken by the subject facility. This report was generated as a result of a request by the MRO/GW Section. I obtained a copy of the report for your information, as this report addresses the soil removal activities which we have discussed. The re-grading project which resulted in the soil removal is discussed on page 3 of the Dames & Moore correspondence. Based upon a review of the analytical data the soil removed and analyzed to date is TCLP non-hazardous.

Please advise should you have any questions.

Attachment

DAMES & MOORE



from the desk of

Steve Hart

Jesse

Mike Slomp at Exxon
requested that I copy you on
this response letter. It may
answer some of your questions
concerning soil at the Exxon
terminal in Cher Lott. If
you have any questions, please
call Mike Slomp at Exxon
at 529.4272.

Steve



4601 CHARLOTTEPARK DRIVE, SUITE 320, CHARLOTTE, NORTH CAROLINA 28217
(704) 522-0330 FAX: (704) 522-0063

September 30, 1993

North Carolina Department of Environment,
Health, and Natural Resources
Division of Environmental Management
Ground Water Section
919 North Main Street
Mooresville, North Carolina 28115

Attention: Ms. Chris DeRoller

Re: Response to NC DEHNR Review
Second Quarter 1993 Report
Exxon Marketing Distribution Terminal
Ground Water Incident No. 5123
Charlotte, Mecklenburg County, North Carolina
D&M Job No. 08837-535-200

Dear Ms. DeRoller:

On behalf of Exxon Co., USA, Dames & Moore is submitting this response to your letter dated August 17, 1993 concerning your review of the Second Quarter 1993 Report for the Exxon Marketing Distribution Terminal located in Charlotte, North Carolina. In this letter, you requested that the quarterly monitoring program be expanded and that information concerning soil sampling and soil removal be submitted. For ease of reference, the specific requests presented in your letter are presented in italics followed by the response.

I am requesting that, due to their mobility, EDB and 1,2-dichloroethane be added to the quarterly monitoring parameter list.

The current Special Order by Consent agreement for the above ground storage tank release requires Exxon to analyze ground water samples for volatile aromatic compounds by expanded EPA Method 602. In addition, the Corrective Action Plan for the former loading rack area requires that Exxon analyze three monitor wells in the former loading rack area for polynuclear aromatic hydrocarbons (EPA Method 610) in the month of February only. As you know, the compounds ethylene dibromide (EDB) and 1,2-dichloroethane are not analyzed for utilizing either methods 602 or 610. In accordance

Ms. Chris DeRoller
September 30, 1993
Page 2

with NC DEHNR guidelines, these compounds would be analyzed for utilizing EPA Method 601.

The addition of the EPA Method 601 analyses to the quarterly monitoring program would essentially double the analytical costs for the program. In order to reduce the quarterly monitoring costs and to provide information concerning the presence of these compounds at the site, Exxon proposes to conduct EPA Method 601 analyses on a limited number of perimeter monitor wells on an annual basis only. In order to be consistent with the additional EPA Method 610 analyses required for those monitor wells in the former loading rack area, it is proposed that the EPA Method 601 analyses be conducted annually during the month of February. Ground water samples from the following perimeter monitor wells are proposed to be analyzed by EPA Method 601 during the February quarterly monitoring event: MW-4, MW-8, MW-15, MW-21, MW-28, MW-29, and MW-30. As with the quarterly monitoring event, no ground water samples will be collected from those monitor wells containing liquid phase petroleum hydrocarbons (LPH). The results of the EPA 601 analyses will be reported for the compounds 1,2-dichloroethane and ethylene dibromide only.

It should be noted that in July 1993 Exxon sampled a limited number of perimeter site monitor wells (monitor wells MW-4, MW-8, MW-29, MW-30, MW-31, and MW-32) for EPA Method 601 analyses (plus ethylene dibromide). The results of the analyses are presented in the attached Table 1. These results and the laboratory data sheets will be presented in the third quarter monitoring report for the facility.

...in order to determine the vertical gradient at the site and to assess the corrective action system's effect on it, wells BRW-1 and BRW-2 should be included in the monthly gauging.

Although Exxon has conducted quarterly gauging data for the two deeper monitor wells BRW-1 and BRW-2, the top of casing elevations for the two wells have as yet not been determined. As you know, Exxon is currently conducting a regrading project at the terminal. This project will require the top of casing construction for certain monitor wells in the tank farm area to be modified. Exxon had intended to determine the top of casing elevations for BRW-1 and BRW-2 at the time that the top of casing elevations of any modified monitor wells were resurveyed. However, because of recent delays in the completion of the regrading project, the monitor well modifications have not been conducted as soon as originally anticipated. Therefore, so that the determination of this information is no longer delayed, Exxon will survey the top of casing elevations of these two monitor wells during the third quarter and will present this data in the third quarter monitoring report.

Ms. Chris DeRoller
September 30, 1993
Page 3

... it is my understanding that significant soil removal and soil sampling has been occurring at the subject site. Please submit a summary of the soil sample results and a map showing the location of any newly identified contaminated soil and associated sampling locations...

Recent Soil Removal

Recent soil removal at the Exxon facility has been conducted as a result of a regrading project which is being conducted inside the tank farm dike area. The regrading project is being conducted in order to improve drainage inside of the tank farm and to upgrade the spill control features at the Exxon facility. The regrading project field activities were initiated on or about July 5, 1993.

Soils which are removed from inside the tank farm floor as part of the regrading activities are stockpiled temporarily on-site inside of the tank farm dike. As they are generated, each stockpile is sampled for medium and low boiling point total petroleum hydrocarbons (TPH) in accordance with NC DEHNR guidelines. The stockpiles are sampled in accordance with NC DEHNR guidelines for stockpile characterization with the number of samples collected from each stockpile being dependent upon the quantity of soil present. To date approximately 21 stockpiles of soil representing a total volume of approximately 2500 cubic yards have been removed from the tank farm.

In accordance with current NC DEHNR guidance, soils containing less than 10 mg/kg low boiling point TPH (i.e., gasoline range petroleum hydrocarbons) and less than 40 mg/kg medium boiling point TPH (i.e., diesel range petroleum hydrocarbons) are not regulated by the NC DEHNR. Based upon the results of the TPH analysis of soil samples collected from the stockpiles, the disposition of those stockpiles containing TPH concentrations less than the NC DEHNR "action levels" are determined. Those soils which indicate no detectable concentrations of TPH (i.e., less than 0.050 mg/kg low boiling point TPH and less than 10 mg/kg medium boiling TPH) have been removed from the site and placed at the Love Grading construction debris landfill located in Charlotte, North Carolina. This is a permitted construction debris landfill. To date, approximately 300 cubic yards of soil have been placed at the Love Grading landfill.

Those soil stockpiles which have indicated detectable concentrations of TPH but which are below the NC DEHNR action levels have been placed on-site as fill material in the northeastern portion of the site. It should be noted that several stockpiles containing concentrations of TPH below the NC DEHNR action levels have been analyzed for Ph and TCLP volatiles, semi-volatiles, and metals to ensure that the soils were non-hazardous. The TCLP levels detected in these soil samples have all been below the applicable federal hazardous waste TCLP levels and the North Carolina land disposal TCLP levels. To date, approximately 1,450 cubic yards of removed soil have been used for fill on-site.

Ms. Chris DeRoller
September 30, 1993
Page 4

For those soil stockpiles which contained concentrations of TPH above the applicable NC DEHNR action levels, further characterization of the stockpile was conducted for off-site waste treatment/disposal purposes. The characterization consisted of compositing the previously collected stockpile soil samples in the laboratory for Ph and TCLP volatile, semi-volatile, and metal analysis. (It should be noted that the initial TPH analyses were conducted on a 24-hour turnaround basis so that the TCLP analyses would be conducted within holding times). The results of the TCLP testing of those stockpiles containing TPH concentrations greater than the NC DEHNR action level have indicated TCLP leachate concentrations less than applicable hazardous waste levels. As such, all of these stockpiled soils have been transported to the Cherokee-Sanford brick facility in Sanford, North Carolina for thermal treatment. The Cherokee-Sanford facility is permitted to treat non-hazardous petroleum hydrocarbon-affected soils. To date, approximately 750 cubic yards of soil have been transported to the Cherokee-Sanford facility for treatment.

Regrading activities are expected to continue for the next several months. Because of the large number of samples which have been analyzed from the stockpiles and the resultant large amount of laboratory data which has been generated, the laboratory data sheets for these samples are not included as part of this submittal. Detailed laboratory reports for the stockpile soil sampling can be provided upon request.

In addition to the regrading activities soil removal, soils were also removed from an area affected by a surface release of gasoline which resulted from damage to a vapor recovery unit at the Exxon facility. The release occurred on July 22, 1993 and was reported to the NC DEHNR Mooresville Regional Office Ground Water Section. Approximately 50 cubic yards of surface soil were removed in response to the release event. The removed soils were stockpiled on-site and tested for waste treatment/disposal purposes. A composite sample was collected from the stockpile for TPH, Ph, and TCLP volatile, semi-volatile, and metals analyses. The results of the testing indicated that the removed soils were non-hazardous. As such, the soils were taken to the Cherokee-Sanford facility for off-site thermal treatment. Laboratory data sheets for the analyses of the soil sample collected from the stockpile are presented in Attachment A to this letter. Exxon is currently in the process of conducting additional investigation in the area of the surface release to ensure that any affected soils have been removed to acceptable levels. Exxon will submit a report of the soil sampling in this area and a plan of corrective action, if necessary by November 30, 1993.

In addition, soils generated from the initial soil vapor extraction system installation generated approximately 40 cubic yards of soil which were temporarily stockpiled and then sampled for characterization purposes. The stockpile was sampled for TPH and TCLP volatiles, semi-volatiles, and metals. The results of the analyses indicated that the TPH levels in the soils were below applicable action levels and the TCLP analyses

Ms. Chris DeRoller
September 30, 1993
Page 5

confirmed that the samples were non-hazardous. Therefore, the soils were used for fill on-site in the northeastern portion of the site. The laboratory data sheets for the remediation activities stockpile are presented in Attachment B to this letter.

Former Oil/Water Separator

An area of potentially affected soils has been identified in the vicinity of a former oil/water separator at the site. The location of the former oil/water separator is presented in the attached Figure 1. The NC DEHNR was informed of the existence of potentially affected soils in this area by Mr. Gary Gibson of Exxon upon their discovery. To date, screening of the soils has been conducted only by the use of a photoionization detector during removal of the tank. Exxon is currently in the process of conducting a soils investigation in the vicinity of the former oil/water separator in order to define the horizontal and vertical extent of petroleum affected soils in this area, if found to be present. Exxon will submit a report of its findings concerning the former oil/water separator soils by November 30, 1993. If necessary, the report will contain a plan of remedial action for any affected soils containing TPH concentrations above NC DEHNR action levels, including any revisions to the soil vapor extraction system layout, if appropriate.

Former Loading Rack Area

In accordance with the Corrective Action Plan for the former loading rack area, Exxon has also conducted additional soil sampling in the area of the former loading rack. The locations of additional soil borings advanced in the area of the former loading rack are presented in Figure 2. Soil samples in the area were collected from both the soil vapor extraction well borings and from Geoprobe borings located outside of the area where soil borings had been advanced previously. The results of the analyses of the collected soil samples are presented in Table 1.

Exxon is currently preparing a report of the soil sampling investigation which will include revisions to the vapor extraction system based upon the additional soil data. Exxon is presently in the process of evaluating the actual performance data for the existing vapor extraction wells in order to design additional vapor well locations. A report of the additional soil sampling investigation and revisions to the vapor extraction system design will be submitted to the NC DEHNR by November 30, 1993.

Additional Area

An additional area of potentially affected soils was identified in the southwest portion of the site north of monitor well MW-30. The potentially affected soils were identified during the regrading activities. The NC DEHNR was notified as to the existence of this area by Mr. Gary Gibson of Exxon upon their discovery. At the time

Ms. Chris DeRoller
September 30, 1993
Page 6

of discovery, a composite sample of the soil from the area was collected and submitted to the laboratory for TPH, Ph, and TCLP volatile, semi-volatile, and metals analyses. The laboratory data sheets for these analyses are presented in Attachment C to this letter. Exxon is currently conducting additional investigations in relation to this matter.

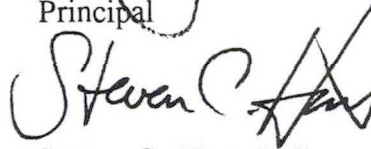
If you have any questions concerning this submittal, please do not hesitate to contact Mike Slemp at (704) 529-4272. It should be noted that Exxon has reviewed this letter and approved its submittal to the NC DEHNR.

Sincerely,

DAMES & MOORE



W. Thomas Turner, P.E.
Principal



Steven C. Hart, P.G.
Project Hydrogeologist

WTT/SCH/jjh

cc: **Jesse Wells - DEHNR**
Mike Slemp - Exxon

Table 1
Results of EPA 601 Analyses
of Selected Perimeter Monitor Wells
Exxon Marketing Distribution Terminal
Charlotte, North Carolina

Monitor Well	Chloroform (ug/l)	1,2-Dichloroethane (ug/l)	Methylene Chloride (ug/l)	Tetrachloroethene (ug/l)
MW-4	1	--	--	--
MW-8	--	--	--	--
MW-29	72	--	14	--
MW-30	--	3	--	3
MW-31	15	--	--	--
MW-32	--	--	--	--

Notes:

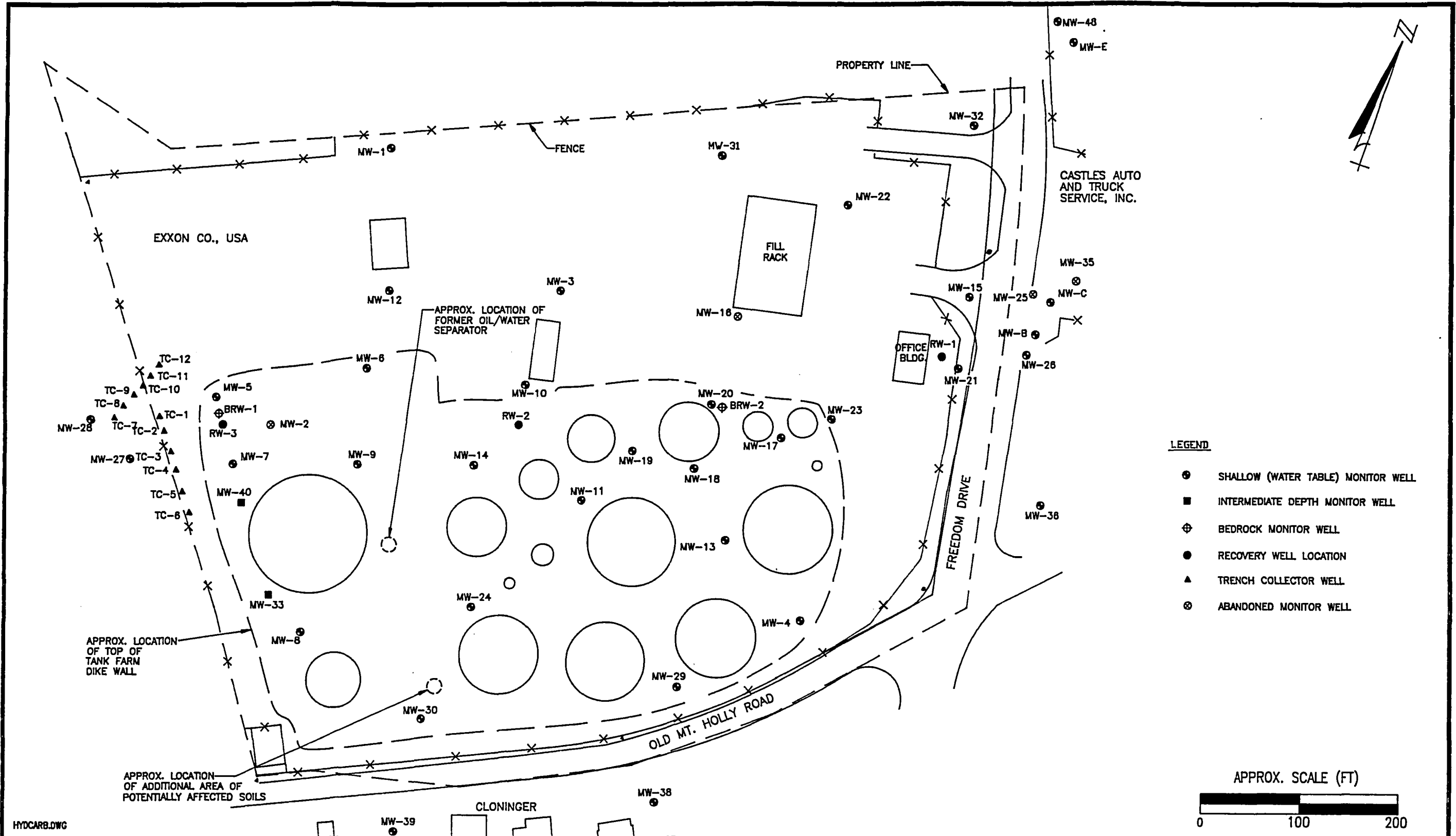
1. Samples collected July 9, 1993.
2. Analyses conducted by NDRC Labs of Richardson, Texas.
3. Analyses conducted by EPA 601 plus ethylene dibromide.
4. Results shown for detected EPA 601 parameters only.

Table 2
Results of Total Petroleum Hydrocarbon Analysis
of Soil Samples
Former Loading Rack Area
Exxon Marketing Distribution Terminal
Charlotte, North Carolina

Boring	Depth (feet)	Total Petroleum Hydrocarbons	
		Method 3550/8000 (mg/kg)	Method 5030/8015 (mg/kg)
GP-1	4-6	2,500	880
GP-1	7-9	1,700	2,600
GP-2	4-6	<10	0.34
GP-2	7-9	290	750
GP-3	4-6	<10	<0.05
GP-3	7-9	<10	<0.05
GP-4	4-6	<10	0.087
GP-4	7-9	1,400	700
GP-5	4-6	<10	0.27
GP-5	7-9	400	530
GP-6	4-6	6,800	1,700
GP-6	7-9	14,000	11,000
GP-7	4-6	40	29
GP-7	7-9	210	700
GP-8	4-6	<10	3
GP-8	7-9	110	460
GP-9	4-6	1,700	790
GP-9	7-9	1,400	3,200
GP-10	4-6	<10	0.28
GP-10	7-9	<10	0.46
GP-11	4-6	<10	0.42
GP-11	7-9	<10	<0.05
SV-1	4-6	<10	4
SV-1	7-9	860	3,400
SV-2	4-6	<10	2.2
SV-2	7-9	14	4
SV-3	4-6	<10	<0.05
SV-3	7-9	<10	0.33
SV-4	4-6	<10	0.62
SV-4	7-9	890	1,600
SV-5	4-6	<10	0.53
SV-5	7-9	5,100	8,100

Notes:

1. GP = Geoprobe Boring
2. SV = Soil Vapor Extraction Well Boring
3. TPH Method 3550/8000 is for diesel range petroleum hydrocarbons (C8-C30).
4. TPH Method 5030/8015 is for gasoline range petroleum hydrocarbons.
5. Analysis conducted by NDRC Laboratories, Inc. of Richardson, Texas.



REV.	DATE	BY	DESCRIPTION	REV.	DATE	BY	DESCRIPTION
0		D.D.W.					

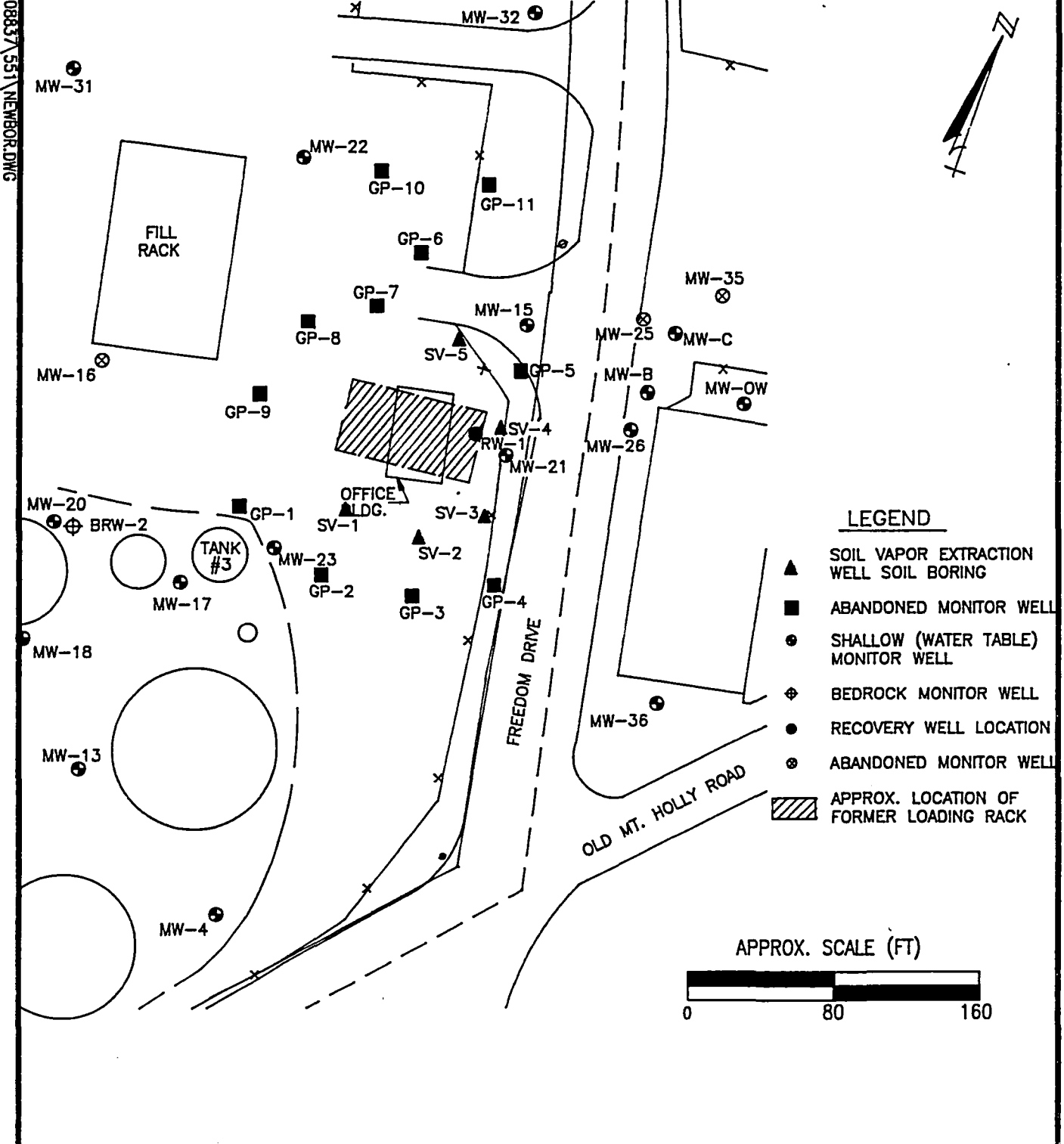
Dames & Moore
 CHARLOTTE, NORTH CAROLINA

DRAWN BY /OFFICE: D.D.W. - CLT	TITLE: SITE PLAN
DESIGNED BY: S.H.	CLIENT: EXXON COMPANY, U.S.A. CHARLOTTE, NORTH CAROLINA TERMINAL
DATE: 9/20/93	JOB NO.: 08837-551
	FIGURE NO.: 1
	REV.: 0

DISK: 08837-551 SITEPLAN

HYCARB.DWG

REV.	DATE	BY	DESCRIPTION	REV.	DATE	BY	DESCRIPTION
0	12/31/93	D.D.W.		0	12/31/93	D.D.W.	



<p>Dames & Moore CHARLOTTE, NORTH CAROLINA</p>	DRAWN BY /OFFICE: D.D.W. - CLT	TITLE LOCATION OF ADDITIONAL SOIL BORINGS FORMER LOADING RACK AREA	
	DESIGNED BY: S.H.	CLIENT EXXON COMPANY, U.S.A. CHARLOTTE, NORTH CAROLINA TERMINAL	
	DATE 9/20/93	JOB NO. 08837-551	FIGURE NO. 2
			REV. 0

DISK: 08837\551\MEMOR.DWG

Attachment A
Analytical Data Sheets
Gasoline Spill Stockpiled Soils



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 27-JUL-1993

REPORT NUMBER : D93-8539-1

REPORT DATE : 6-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : GS-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 26-JUL-1993
PREPARATION METHOD : EPA 1311/3520
PREPARED BY : TLR
PREPARED ON : 27-JUL-1993
ANALYSIS METHOD : EPA 1311/8270
ANALYZED BY : MCS
ANALYZED ON : 2-AUG-1993
DILUTION FACTOR : 1

TCLP EXTRACTABLE ORGANICS					
TEST REQUESTED	DETECTION LIMIT		RESULTS		
o-Cresol	0.2	mg/L	<	0.2	mg/L
m-Cresol	0.2	mg/L	<	0.2	mg/L
p-Cresol	0.2	mg/L	<	0.2	mg/L
2,4-Dinitrotoluene	0.1	mg/L	<	0.1	mg/L
Hexachlorobenzene	0.1	mg/L	<	0.1	mg/L
Hexachlorobutadiene	0.1	mg/L	<	0.1	mg/L
Hexachloroethane	0.1	mg/L	<	0.1	mg/L
Nitrobenzene	0.1	mg/L	<	0.1	mg/L
Pentachlorophenol	0.5	mg/L	<	0.5	mg/L
Pyridine	0.1	mg/L	<	0.1	mg/L
2,4,5-Trichlorophenol	0.1	mg/L	<	0.1	mg/L
2,4,6-Trichlorophenol	0.1	mg/L	<	0.1	mg/L



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8539-1
ANALYSIS METHOD : EPA 1311/8270

PAGE 2

QUALITY CONTROL DATA				
SURROGATE COMPOUND	SPIKE LEVEL		SPIKE RECOVERED	
Nitrobenzene-d5 (SS)	50.0	µg/L	109	%
2-Fluorobiphenyl (SS)	50.0	µg/L	122	%
Terphenyl-d14 (SS)	50.0	µg/L	113	%
Phenol-d5 (SS)	100	µg/L	56.1	%
2-Fluorophenol (SS)	100	µg/L	52.5	%
2,4,6-Tribromophenol (SS)	100	µg/L	98.8	%

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 27-JUL-1993

REPORT NUMBER : D93-8539-1
REPORT DATE : 6-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : GS-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 26-JUL-1993
PREPARATION METHOD : EPA 1311
PREPARED BY : TLR
PREPARED ON : 28-JUL-1993
ANALYSIS METHOD : EPA 1311/8240
ANALYZED BY : NTT
ANALYZED ON : 29-JUL-1993
DILUTION FACTOR : 1

TCLP VOLATILE ORGANICS			
TEST REQUESTED	DETECTION LIMIT		RESULTS
Benzene	0.01	mg/L	< 0.01 mg/L
Carbon tetrachloride	0.01	mg/L	< 0.01 mg/L
Chlorobenzene	0.01	mg/L	< 0.01 mg/L
Chloroform	0.01	mg/L	< 0.01 mg/L
1,4-Dichlorobenzene	0.01	mg/L	< 0.01 mg/L
1,2-Dichloroethane	0.01	mg/L	< 0.01 mg/L
1,1-Dichloroethene	0.01	mg/L	< 0.01 mg/L
Methyl ethyl ketone	1.00	mg/L	< 1.00 mg/L
Tetrachloroethene	0.01	mg/L	< 0.01 mg/L
Trichloroethene	0.01	mg/L	< 0.01 mg/L
Vinyl chloride	0.02	mg/L	< 0.02 mg/L



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8539-1
ANALYSIS METHOD : EPA 1311/8240

PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
1,2-Dichloroethane-d4(SS)	50.0 µg/L	92.9 %
Toluene-d8(SS)	50.0 µg/L	109 %
Bromofluorobenzene(SS)	50.0 µg/L	113 %

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 27-JUL-1993

REPORT NUMBER : D93-8539-1
REPORT DATE : 6-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : GS-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 26-JUL-1993
ANALYSIS METHOD : EPA 5030/8015
ANALYZED BY : VLH
ANALYZED ON : 28-JUL-1993
DILUTION FACTOR : 100

TRPH BY EPA METHOD MODIFIED 8015		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon	5000 $\mu\text{g/Kg}$	150000 $\mu\text{g/Kg}$

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Fluorobenzene	50.0 $\mu\text{g/Kg}$	91.0 %

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
 Richardson, TX 75081
 Tel. 214-238-5591
 Fax. 214-238-5592

DATE RECEIVED : 27-JUL-1993

REPORT NUMBER : D93-8539-1
 REPORT DATE : 6-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
 ADDRESS : 4601 Charlotte Park Dr.
 : Charlotte, NC 28217
 ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
 ID MARKS : GS-1
 : Charlotte, NC
 PROJECT : Exxon Terminal #4116
 DATE SAMPLED : 26-JUL-1993

TCLP METALS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Silver	0.01 mg/L	< 0.01 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 27-JUL-1993 by CCM Analyzed using EPA 6010 on 29-JUL-1993 by KJS		
Arsenic	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 27-JUL-1993 by CCM Analyzed using EPA 6010 on 29-JUL-1993 by KJS		
Barium	0.1 mg/L	1.6 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 27-JUL-1993 by CCM Analyzed using EPA 6010 on 29-JUL-1993 by KJS		
Cadmium	0.01 mg/L	< 0.01 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 27-JUL-1993 by CCM Analyzed using EPA 6010 on 29-JUL-1993 by KJS		
Chromium	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 27-JUL-1993 by CCM Analyzed using EPA 6010 on 29-JUL-1993 by KJS		
Mercury	0.001 mg/L	< 0.001 mg/L
Dilution Factor : 1 Prepared using EPA 1311/7470 on 27-JUL-1993 by CCM Analyzed using EPA 7470 on 30-JUL-1993 by SKW		



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8539-1

PAGE 2

TCLP METALS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Lead	0.02 mg/L	< 0.02 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 27-JUL-1993 by CCM Analyzed using EPA 6010 on 29-JUL-1993 by KJS		
Selenium	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 27-JUL-1993 by CCM Analyzed using EPA 6010 on 29-JUL-1993 by KJS		

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 27-JUL-1993

REPORT NUMBER : D93-8539-1

REPORT DATE : 6-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : GS-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 26-JUL-1993

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
pH		6.8
Analyzed using EPA 9045 on 28-JUL-1993 by KOB		
Total Solids	0.01 %	81.1 %
Analyzed using EPA 160.3 on 28-JUL-1993 by CLM		

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED: 27-JUL-1993

REPORT NUMBER: D93-8539

REPORT DATE: 6-AUG-1993

SUBMITTED BY: Dames & Moore

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Silver	Arsenic	Barium	Cadmium	Chromium	Lead
BATCH No.	2920	2920	2920	2920	2920	2920
MATRIX	Soil	Soil	Soil	Soil	Soil	Soil
PREP METHOD	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA1311/3015	EPA 1311/3015	EPA 1311/3015
PREP DATE	7/27/93	7/27/93	7/27/93	7/27/93	7/27/93	7/27/93
PREP TECHNICIAN	CCM	CCM	CCM	CCM	CCM	CCM
ANALYSIS METHOD	EPA 6010	EPA 6010	EPA 6010	EPA 6010	EPA 6010	EPA 6010
ANALYSIS DATE	7/29/93	7/29/93	7/29/93	7/29/93	7/29/93	7/29/93
ANALYST	KJS	KJS	KJS	KJS	KJS	KJS
METHOD BLANK	< 0.01 mg/L	< 0.05 mg/L	< 0.10 mg/L	< 0.01 mg/L	< 0.05 mg/L	< 0.02 mg/L
MS % RECOVERY	77.0	124	105	89.1	95.3	96.4
LCS % RECOVERY	87.3	----	94.0	91.4	90.4	---- *
DUPLICATE RPD	----	----	5.18	----	----	----
MS/MSD RPD	5.56	37.5 **	5.68	3.54	9.11	3.48
SPIKE LEVEL	0.05 mg/L	1.00 mg/L	1.00 mg/L	0.10 mg/L	0.50 mg/L	0.50 mg/L
SPIKED SAMPLE ID No.	D93-8539-1	D93-8539-1	D93-8539-1	D93-8539-1	D93-8539-1	D93-8539-1
DUPLICATE SAMPLE ID No.	D93-8539-1	D93-8539-1	D93-8539-1	D93-8539-1	D93-8539-1	D93-8539-1

MS: Matrix Spike
MSD: Matrix Spike Duplicate
LCS: Laboratory Control Sample
RPD: Relative Percent Difference

COMMENTS: *This analyte was not included in the LCS and/or spike mixture.

**Multiple preparations indicate that unacceptable RPD's are the result of a non-homogeneous QC sample.



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED: 27-JUL-1993

REPORT NUMBER: D93-8539

Page 2 of 2

SUBMITTED BY: Dames & Moore

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Selenium	TCLP Mercury	pH	Total Solids	TPH	TPH
BATCH No.	2920	2922	----	----	22	----
MATRIX	Soil	Soil	Soil	Soil	Soil	Soil
PREP METHOD	EAP 1311/3015	EPA 1311/7470	----	----	EPA 3550	EPA 5030
PREP DATE	7/27/93	7/27/93	----	----	7/21/93	7/27/93
PREP TECHNICIAN	CCM	CCM	----	----	TLR	VLH
ANALYSIS METHOD	EPA 6010	EPA 7470	EPA 9045	EPA 160.3	EPA 8000	EPA 8015
ANALYSIS DATE	7/29/93	7/30/93	7/28/93	7/28/93	7/21/93	7/27/93
ANALYST	KJS	SKW	KOB	CLM	JMT	VLH
METHOD BLANK	< 0.05 mg/L	< 0.001 mg/L	----	----	< 10.0 mg/Kg	< 50.0 µg/Kg
MS % RECOVERY	126	106	----	----	---- **	107
LCS % RECOVERY	---- *	102	----	----	112	90.3
DUPLICATE RPD	----	----	0.00	3.70	----	----
MS/MSD RPD	6.64	6.12	----	----	---- **	0.00
SPIKE LEVEL	1.00 mg/L	0.01 mg/L	----	----	83.3 mg/Kg	250 µg/Kg
SPIKED SAMPLE ID No.	D93-8539-1	D93-8539-1	----	----	D93-8240-2	D93-8404-1
DUPLICATE SAMPLE ID No.	D93-8539-1	D93-8539-1	D93-8539-4	D93-8539-1	----	----

MS: Matrix Spike
MSD: Matrix Spike Duplicate
LCS: Laboratory Control Sample
RPD: Relative Percent Difference

COMMENTS: *This analyte was not included in the LCS and/or spike mixture.
**Spike lost to sample matrix interference.

WATER SEMIVOLATILE MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name:NDRC

Contract: TCLP

Lab Code: HP004

Case No.: MCS

SAS No.E 7/29/93

SDG No.A 8/3/93

Matrix Spike - EPA Sample No.: 8539-3 B20

COMPOUND	SPIKE ADDED (ug/L)	SAMPLE CONCENTRATION (ug/L)	MS CONCENTRATION (ug/L)	MS % REC #	QC LIMITS REC.
Pyridine	1000.00	0.00	330.00	33	10-120
2-Methylphenol	1000.00	0.00	650.00	65	10-145
Nitrobenzene	1000.00	0.00	780.00	78	40-150
2,4,6-Trichlorophenol	1000.00	0.00	730.00	73	40-150
2,4-Dinitrotoluene	1000.00	0.00	820.00	82	40-150
Hexachlorobenzene	1000.00	0.00	910.00	91	35-115
Pentachlorophenol	1000.00	0.00	770.00	77	20-130

COMPOUND	SPIKE ADDED (ug/L)	MSD CONCENTRATION (ug/L)	MSD % REC #	% RPD #	QC LIMITS RPD	REC.
Pyridine	1000.00	440.00	44	28	50	10-120
2-Methylphenol	1000.00	670.00	67	3	15	10-145
Nitrobenzene	1000.00	800.00	80	2	40	40-150
2,4,6-Trichlorophenol	1000.00	770.00	77	5	40	40-150
2,4-Dinitrotoluene	1000.00	800.00	80	2	40	40-150
Hexachlorobenzene	1000.00	940.00	94	3	20	35-115
Pentachlorophenol	1000.00	860.00	86	11	40	20-130

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of qc limits

RPD: 0 out of 7 outside limits

Spike Recovery: 0 out of 14 outside limits

COMMENTS: SW-846 EPA METHOD 8270

3C
WATER SEMIVOLATILE MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name: NDRC

Contract: TCLP 4

Lab Code: HP004

Case No.: AD-76

SAS No. E 7/19/93

SDG No. A 7/21/93

Matrix Spike - EPA Sample No.: 8121-3 3520_B99

COMPOUND	SPIKE ADDED (ug/L)	SAMPLE CONCENTRATION (ug/L)	MS CONCENTRATION (ug/L)	MS % REC #	QC LIMITS REC.
Pyridine	1000.00	0.00	0.00	0 *	10-120
2-Methylphenol	1000.00	0.00	890.00	89	10-145
Nitrobenzene	1000.00	0.00	1020.00	100	40-150
2,4,6-Trichlorophenol	1000.00	0.00	920.00	92	40-150
2,4-Dinitrotoluene	1000.00	0.00	940.00	94	40-150
Hexachlorobenzene	1000.00	0.00	880.00	88	35-115
Pentachlorophenol	1000.00	0.00	830.00	83	20-130

COMPOUND	SPIKE ADDED (ug/L)	MSD CONCENTRATION (ug/L)	MSD % REC #	% RPD #	QC LIMITS RPD	REC.
Pyridine	1000.00	0.00	0 *	0	50	10-120
2-Methylphenol	1000.00	900.00	90	1	15	10-145
Nitrobenzene	1000.00	960.00	96	4	40	40-150
2,4,6-Trichlorophenol	1000.00	900.00	90	2	40	40-150
2,4-Dinitrotoluene	1000.00	900.00	90	4	40	40-150
Hexachlorobenzene	1000.00	860.00	86	2	20	35-115
Pentachlorophenol	1000.00	880.00	88	5	40	20-130

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of qc limits

RPD: 0 out of 7 outside limits

Spike Recovery: 2 out of 14 outside limits

COMMENTS: SW-846 EPA METHOD 8270

07/29/93



NDRC LABORATORIES, INC.

A member of Incheape Environmental

1089 East Collins Blvd., Richardson, Texas 75081 • (214) 238-5591 • FAX (214) 238-5592

BEAUMONT

DALLAS

HOUSTON

D93 - 85903 MS + MSD

3A

WATER VOLATILE MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name: NDRC Laboratories, Inc.Contract: TCLP Volatiles

Lab Sample Number: _____

EPA No.: _____

COMPOUND	SPIKE ADDED (ug/L)	SAMPLE CONC. (ug/L)	MS CONC. (ug/L)	MS % REC.	QC LIMITS REC.
Vinyl Chloride	100.00	0.0	68.2	68.2	61-125
1,1-Dichloroethene	100.00		84.7	84.7	61-125
2-Butanone	100.00		109	109	70-125
Chloroform	100.00		115	115	70-125
1,2-Dichloroethane	100.00		120	120	70-125
Trichloroethene	100.00	88.6	118	118	70-125
Benzene	100.00	0.0	201	112	70-125
Carbon Tetrachloride	100.00		107	107	70-125
Tetrachloroethene	100.00		114	114	70-125
Chlorobenzene	100.00		119	119	70-125
1,4-Dichlorobenzene	100.00		120	120	70-125

COMPOUND	SPIKE ADDED (ug/L)	MSD CONC. (ug/L)	MSD % REC.	% RPD	QC LIMITS RPD	REC.
Vinyl Chloride	100.00	68.9	68.9	1	15	61-125
1,1-Dichloroethene	100.00	89.6	89.6	6	15	61-125
2-Butanone	100.00	114	114	4	15	70-125
Chloroform	100.00	121	121	5	15	70-125
1,2-Dichloroethane	100.00	118	118	2	15	70-125
Trichloroethene	100.00	121	121	2	15	70-125
Benzene	100.00	207	118	5	15	70-125
Carbon Tetrachloride	100.00	110	110	3	15	70-125
Tetrachloroethene	100.00	105	105	8	15	70-125
Chlorobenzene	100.00	124	124	4	15	70-125
1,4-Dichlorobenzene	100.00	114	114	5	15	70-125

≠ Column to be used to flag recovery and RPD values with an asterisk
 * Values outside of QC limits

RPD: 0 out of 11 outside of limitsSpike Recovery: 0 out of 22 outside of limits

COMMENTS: _____



CHAIN OF CUSTODY RECORD

EXXON Company, USA
Regional Laboratory Program

NDRC Laboratories, Inc. 1089 East Collins Blvd, Richardson, Texas 75081 (214) 238-5591 (Voice), (214) 238-5592 (Fax)
Attn: Belinda Feuerbacher, Project Manager

Consultant's Name: <u>Dames + Moore</u>						Page <u>1</u> of <u>1</u>					
Address: <u>4601 Charlotte Park Dr. Ste 320 Charlotte, NC 28217</u>											
Project: <u>EXXON</u>				Consultant Proj #:				Consultant Work Release #: <u>61002</u>			
Project Contact: <u>BEN SKELTON</u>				Phone: <u>704-522-0330</u> Fax: <u>704-522-0063</u>				Laboratory Work Release #: <u>NA</u>			
Alternate Contact: <u>Steve Hart</u>				Phone: <u>SAME</u> Fax: <u>SAME</u>				Site Location: <u>CHARLOTTE, NC</u>			
EXXON Contact: <u>Jerry Crawford</u> EE / (C&M) (circle one)				Phone: <u>704-529-4232</u> Fax: <u>529-4248</u>				EXXON Part : <u>TERMINAL # 4116</u>			
Sampled by (print): <u>TIMOTHY B. SKELTON</u>						Sampler's Signature: <u>Timothy B Skelton</u>					
Shipment Method: <u>Burlington Air</u>			Air Bill #: <u>698245026</u>			ANALYSIS REQUIRED Number of Containers			Sample Condition as Received Temperature °C: <u>4°C</u> Cooler #: <u>N/A</u> Inbound Sealed: <u>Yes</u> No Outbound Sealed: <u>Yes</u> No		
Shipment Date: <u>7-26-93</u>			<u>647636883</u> <u>647636814</u>								
SAMPLE ID	DATE	TIME	MATRIX WATER/ SOIL	PRSV	SAMPLE LOCATION/ DESCRIPTION	TPH 0.30/0.015	TCLP	VOC SVOC METALS	TPH 3500 8000	pH	
GS-1	7/26/93	1900	SOIL	X		4	✓				-1
SP-16A	7/26/93	1915	"	"	STOCKPILE #16	4	✓	✓	✓		-2
SP-16B	7/26/93	1915	"	"	"	4	✓	✓	✓		-3
SP-16C	7/26/93	1915	"	"	"	4	✓	✓	✓		-4
<p>TPH: DUE JULY 28, 93 ALL ELSE DUE: AUGUST 5, 93 SOIL / WIC</p>											<p>RUSH and Normal TAT</p>
Turn around time <input type="checkbox"/> 24 hr <input type="checkbox"/> 48 hr <input type="checkbox"/> 72 hr <input type="checkbox"/> Standard <input checked="" type="checkbox"/> Other <u>See Comments</u>						Total # of Containers: <u>16</u>					
(1) Relinquished by Signature <u>Timothy B Skelton</u>			Date <u>7/26/93</u>			(2) Relinquished by Signature			Date		
Company: <u>Dames + Moore</u>			Time: <u>2000</u>			Company:			Time:		
(1) Received by Signature <u>Jennifer Dugar</u>			Date <u>2/27/93</u>			(2) Received by Signature			Date		
Company: <u>ITS</u>			Time: <u>13:20</u>			Company:			Time:		

Attachment B

**Analytical Data Sheets
Remediation Activities Stockpiled Soils**



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 31-JUL-1993

REPORT NUMBER : D93-8774-1

REPORT DATE : 12-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : MC-1
: Charlotte, NC
PROJECT : Exxon Terminal 4116
DATE SAMPLED : 30-JUL-1993
PREPARATION METHOD : EPA 1311
PREPARED BY : TAP
PREPARED ON : 4-AUG-1993
ANALYSIS METHOD : EPA 1311/8270
ANALYZED BY : MCS
ANALYZED ON : 10-AUG-1993
DILUTION FACTOR : 1
METHOD FACTOR : 10

TCLP EXTRACTABLE ORGANICS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
o-Cresol	0.2 mg/L	< 0.2 mg/L
m-Cresol	0.2 mg/L	< 0.2 mg/L
p-Cresol	0.2 mg/L	< 0.2 mg/L
2,4-Dinitrotoluene	0.1 mg/L	< 0.1 mg/L
Hexachlorobenzene	0.1 mg/L	< 0.1 mg/L
Hexachlorobutadiene	0.1 mg/L	< 0.1 mg/L
Hexachloroethane	0.1 mg/L	< 0.1 mg/L
Nitrobenzene	0.1 mg/L	< 0.1 mg/L
Pentachlorophenol	0.5 mg/L	< 0.5 mg/L
Pyridine	0.1 mg/L	< 0.1 mg/L
2,4,5-Trichlorophenol	0.1 mg/L	< 0.1 mg/L
2,4,6-Trichlorophenol	0.1 mg/L	< 0.1 mg/L



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8774-1
ANALYSIS METHOD : EPA 1311/8270

PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Nitrobenzene-d5 (SS)	50.0 µg/L	113 %
2-Fluorobiphenyl (SS)	50.0 µg/L	113 %
Terphenyl-d14 (SS)	50.0 µg/L	118 %
Phenol-d5 (SS)	100 µg/L	64.3 %
2-Fluorophenol (SS)	100 µg/L	66.2 %
2,4,6-Tribromophenol (SS)	100 µg/L	96.1 %

NDRC Laboratories, Inc.

Martin Jeffus dm
Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 31-JUL-1993

REPORT NUMBER : D93-8774-1

REPORT DATE : 12-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : MC-1
: Charlotte, NC
PROJECT : Exxon Terminal 4116
DATE SAMPLED : 30-JUL-1993
PREPARATION METHOD : EPA 1311
PREPARED BY : TAP
PREPARED ON : 3-AUG-1993
ANALYSIS METHOD : EPA 1311/8240
ANALYZED BY : NTT
ANALYZED ON : 4-AUG-1993
DILUTION FACTOR : 1

TCLP VOLATILE ORGANICS			
TEST REQUESTED	DETECTION LIMIT		RESULTS
Benzene	0.01	mg/L	< 0.01 mg/L
Carbon tetrachloride	0.01	mg/L	< 0.01 mg/L
Chlorobenzene	0.01	mg/L	< 0.01 mg/L
Chloroform	0.01	mg/L	< 0.01 mg/L
1,4-Dichlorobenzene	0.01	mg/L	< 0.01 mg/L
1,2-Dichloroethane	0.01	mg/L	< 0.01 mg/L
1,1-Dichloroethene	0.01	mg/L	< 0.01 mg/L
Methyl ethyl ketone	1.00	mg/L	< 1.00 mg/L
Tetrachloroethene	0.01	mg/L	< 0.01 mg/L
Trichloroethene	0.01	mg/L	< 0.01 mg/L
Vinyl chloride	0.02	mg/L	< 0.02 mg/L



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8774-1
ANALYSIS METHOD : EPA 1311/8240

PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
1,2-Dichloroethane-d4(SS)	50.0 µg/L	79.8 %
Toluene-d8(SS)	50.0 µg/L	90.0 %
Bromofluorobenzene(SS)	50.0 µg/L	86.0 %

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 31-JUL-1993

REPORT NUMBER : D93-8774-1
REPORT DATE : 12-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : MC-1
: Charlotte, NC
PROJECT : Exxon Terminal 4116
DATE SAMPLED : 30-JUL-1993
PREPARATION METHOD : EPA 3550
PREPARED BY : TAP
PREPARED ON : 3-AUG-1993
ANALYSIS METHOD : EPA 8000
ANALYZED BY : JMT
ANALYZED ON : 6-AUG-1993
DILUTION FACTOR : 1
METHOD FACTOR : 1

TOTAL PETROLEUM HYDROCARBON BY GC		
TEST REQUESTED	DETECTION LIMIT	RESULTS
TPH as Diesel Range Organics	10 mg/Kg	38 mg/Kg

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
o-Terphenyl (SS)	100 mg/Kg	94.1 %

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 31-JUL-1993

REPORT NUMBER : D93-8774-1

REPORT DATE : 12-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : MC-1
: Charlotte, NC
PROJECT : Exxon Terminal 4116
DATE SAMPLED : 30-JUL-1993
ANALYSIS METHOD : EPA 5030/8015
ANALYZED BY : VLH
ANALYZED ON : 5-AUG-1993
DILUTION FACTOR : 1
METHOD FACTOR : 1

TRPH BY EPA METHOD MODIFIED 8015		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon	50 $\mu\text{g/Kg}$	< 50 $\mu\text{g/Kg}$

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Fluorobenzene	50.0 $\mu\text{g/Kg}$	100 %

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 31-JUL-1993

REPORT NUMBER : D93-8774-1
REPORT DATE : 12-AUG-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : MC-1
: Charlotte, NC
PROJECT : Exxon Terminal 4116
DATE SAMPLED : 30-JUL-1993

TCLP METALS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Silver	0.01 mg/L	< 0.01 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 3-AUG-1993 by TAP Analyzed using EPA 6010 on 5-AUG-1993 by KJS		
Arsenic	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 3-AUG-1993 by TAP Analyzed using EPA 6010 on 5-AUG-1993 by KJS		
Barium	0.1 mg/L	0.9 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 3-AUG-1993 by TAP Analyzed using EPA 6010 on 5-AUG-1993 by KJS		
Cadmium	0.01 mg/L	< 0.01 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 3-AUG-1993 by TAP Analyzed using EPA 6010 on 5-AUG-1993 by KJS		
Chromium	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 3-AUG-1993 by TAP Analyzed using EPA 6010 on 5-AUG-1993 by KJS		
Mercury	0.001 mg/L	< 0.001 mg/L
Dilution Factor : 1 Prepared using EPA 1311/7470 on 3-AUG-1993 by TAP Analyzed using EPA 7470 on 6-AUG-1993 by SKW		



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8774-1

PAGE 2

TCLP METALS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Lead	0.02 mg/L	< 0.02 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 3-AUG-1993 by TAP Analyzed using EPA 6010 on 5-AUG-1993 by KJS		
Selenium	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 3-AUG-1993 by TAP Analyzed using EPA 6010 on 5-AUG-1993 by KJS		

NDRC Laboratories, Inc.

Martin Jeffus dm

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED: 31-JUL-1993

REPORT NUMBER: D93-8774

REPORT DATE: 12-AUG-1993

SUBMITTED BY: Dames & Moore

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Silver	Arsenic	Barium	Cadmium	Chromium	Lead
BATCH No.	3071	3071	3071	3071	3071	3071
PREP METHOD	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA1311/3015	EPA 1311/3015	EPA 1311/3015
PREP DATE	8/3/93	8/3/93	8/3/93	8/3/93	8/3/93	8/3/93
PREP TECHNICIAN	TAP	TAP	TAP	TAP	TAP	TAP
ANALYSIS METHOD	EPA 6010	EPA 6010	EPA 6010	EPA 6010	EPA 6010	EPA 6010
ANALYSIS DATE	8/5/93	8/5/93	8/5/93	8/5/93	8/5/93	8/5/93
ANALYST	KJS	KJS	KJS	KJS	KJS	KJS
METHOD BLANK	< 0.01 mg/L	< 0.05 mg/L	< 0.10 mg/L	< 0.01 mg/L	< 0.05 mg/L	< 0.02 mg/L
MS % RECOVERY	84.0	94.3	104	104	104	97.3
LCS % RECOVERY	83.8	---- *	95.5	90.8	95.1	73.9
DUPLICATE RPD	----	----	2.23	----	----	----
MS/MSD RPD	7.41	3.03	1.90	3.92	0.97	5.69
SPIKE LEVEL	0.05 mg/L	1.00 mg/L	1.00 mg/L	0.10 mg/L	0.50 mg/L	0.50 mg/L
SPIKED SAMPLE ID No.	D93-8774-1	D93-8774-1	D93-8774-1	D93-8774-1	D93-8774-1	D93-8774-1
DUPLICATE SAMPLE ID No.	D93-8774-1	D93-8774-1	D93-8774-1	D93-8774-1	D93-8774-1	D93-8774-1

MS: Matrix Spike
MSD: Matrix Spike Duplicate
LCS: Laboratory Control Sample
RPD: Relative Percent Difference

COMMENTS: *This analyte was not included in the LCS and/or spike mixture.



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED: 31-JUL-1993

REPORT NUMBER: D93-8774

Page 2 of 2

SUBMITTED BY: Dames & Moore

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Selenium	Mercury	TPH	TPH
BATCH No.	3071	3077	----	22
PREP METHOD	EPA 1311/3015	EPA 1311/7470	EPA 5030	EPA 3550
PREP DATE	8/3/93	8/3/93	8/5/93	7/21/93
PREP TECHNICIAN	TAP	TAP	VLH	TAP
ANALYSIS METHOD	EPA 6010	EPA 7470	EPA 8015	EPA 8000
ANALYSIS DATE	8/5/93	8/6/93	8/5/93	7/21/93
ANALYST	KJS	SKW	VLH	JMT
METHOD BLANK	< 0.05 mg/L	< 0.001 mg/L	< 50.0 µg/Kg	< 10.0 mg/Kg
MS % RECOVERY	99.6	125	103	---- **
LCS % RECOVERY	---- *	94.2	79.2	112
DUPLICATE RPD	0.60	----	----	----
MS/MSD RPD	12.6	3.92	5.80	---- **
SPIKE LEVEL	1.00 mg/L	0.01 mg/L	250 µg/Kg	83.3 mg/Kg
SPIKED SAMPLE ID No.	D93-8774-1	D93-8771-1	D93-8771-1	D93-8240-2
DUPLICATE SAMPLE ID No.	D93-8774-1	D93-8771-1	----	----

MS: Matrix Spike
MSD: Matrix Spike Duplicate
LCS: Laboratory Control Sample
RPD: Relative Percent Difference

COMMENTS: *This analyte was not included in the LCS and/or spike mixture.

**Spike lost to sample matrix interference.

08/04/93



NDRC LABORATORIES, INC.

A member of Incheape Environmental

1089 East Collins Blvd., Richardson, Texas 75081 • (214) 238-5591 • FAX (214) 238-5592

BEAUMONT

DALLAS

HOUSTON

D93 - 87144 MS + MSD

3A

WATER VOLATILE MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name: NDRC Laboratories, Inc.Contract: TCLP Volatiles

Lab Sample Number: _____

EPA No.: _____

COMPOUND	SPIKE ADDED (ug/L)	SAMPLE CONC. (ug/L)	MS CONC. (ug/L)	MS % REC.	QC LIMITS REC.
Vinyl Chloride	100.00	0.0	82.2	82.2	61-125
1,1-Dichloroethene	100.00		81.2	81.2	61-125
2-Butanone	100.00		112	112	70-125
Chloroform	100.00		98.9	98.9	70-125
1,2-Dichloroethane	100.00		103	103	70-125
Trichloroethene	100.00		111	111	70-125
Benzene	100.00		103	103	70-125
Carbon Tetrachloride	100.00		121	121	70-125
Tetrachloroethene	100.00		110	110	70-125
Chlorobenzene	100.00		124	124	70-125
1,4-Dichlorobenzene	100.00	✓	116	116	70-125

COMPOUND	SPIKE ADDED (ug/L)	MSD CONC. (ug/L)	MSD % REC.	% RPD	QC LIMITS RPD	REC.
Vinyl Chloride	100.00	79.1	79.1	4	15	61-125
1,1-Dichloroethene	100.00	78.9	78.9	3	15	61-125
2-Butanone	100.00	103	103	8	15	70-125
Chloroform	100.00	98.0	98.0	0.9	15	70-125
1,2-Dichloroethane	100.00	97.8	97.8	5	15	70-125
Trichloroethene	100.00	124	124	11	15	70-125
Benzene	100.00	97.5	97.5	5	15	70-125
Carbon Tetrachloride	100.00	117	117	3	15	70-125
Tetrachloroethene	100.00	108	108	2	15	70-125
Chlorobenzene	100.00	123	123	0.8	15	70-125
1,4-Dichlorobenzene	100.00	110	110	5	15	70-125

≠ Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 11 outside of limitsSpike Recovery: 0 out of 22 outside of limits

COMMENTS: _____

WATER SEMIVOLATILE MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name:NDRC

Contract: TCLP

Lab Code: HP004

Case No.: MCS

SAS No.E 7/29/93

SDG No.A 8/3/93

Matrix Spike - EPA Sample No.: 8539-3

COMPOUND	SPIKE ADDED (ug/L)	SAMPLE CONCENTRATION (ug/L)	MS CONCENTRATION (ug/L)	MS % REC #	QC LIMITS REC.
Pyridine	1000.00	0.00	330.00	33	110-120
2-Methylphenol	1000.00	0.00	650.00	65	110-145
Nitrobenzene	1000.00	0.00	780.00	78	140-150
2,4,6-Trichlorophenol	1000.00	0.00	730.00	73	140-150
2,4-Dinitrotoluene	1000.00	0.00	820.00	82	140-150
Hexachlorobenzene	1000.00	0.00	910.00	91	135-115
Pentachlorophenol	1000.00	0.00	770.00	77	120-130

COMPOUND	SPIKE ADDED (ug/L)	MSD CONCENTRATION (ug/L)	MSD % REC #	% RPD #	QC LIMITS RPD REC.
Pyridine	1000.00	440.00	44	28	50 110-120
2-Methylphenol	1000.00	670.00	67	3	15 110-145
Nitrobenzene	1000.00	800.00	80	2	40 140-150
2,4,6-Trichlorophenol	1000.00	770.00	77	5	40 140-150
2,4-Dinitrotoluene	1000.00	800.00	80	2	40 140-150
Hexachlorobenzene	1000.00	940.00	94	3	20 135-115
Pentachlorophenol	1000.00	860.00	86	11	40 120-130

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of qc limits

RPD: 0 out of 7 outside limits

Spike Recovery: 0 out of 14 outside limits

COMMENTS: SW-846 EPA METHOD 8270

Attachment C

**Analytical Data Sheets
Additional Area Soils**



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 20-JUL-1993

REPORT NUMBER : D93-8241-1
REPORT DATE : 28-JUL-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : COA-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 19-JUL-1993
PREPARATION METHOD : EPA 1311/3520
PREPARED BY : TLR
PREPARED ON : 21-JUL-1993
ANALYSIS METHOD : EPA 1311/8270
ANALYZED BY : MCS
ANALYZED ON : 26-JUL-1993
DILUTION FACTOR : 1

TCLP EXTRACTABLE ORGANICS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
o-Cresol	0.2 mg/L	< 0.2 mg/L
m-Cresol	0.2 mg/L	< 0.2 mg/L
p-Cresol	0.2 mg/L	< 0.2 mg/L
2,4-Dinitrotoluene	0.1 mg/L	< 0.1 mg/L
Hexachlorobenzene	0.1 mg/L	< 0.1 mg/L
Hexachlorobutadiene	0.1 mg/L	< 0.1 mg/L
Hexachloroethane	0.1 mg/L	< 0.1 mg/L
Nitrobenzene	0.1 mg/L	< 0.1 mg/L
Pentachlorophenol	0.5 mg/L	< 0.5 mg/L
Pyridine	0.1 mg/L	< 0.1 mg/L
2,4,5-Trichlorophenol	0.1 mg/L	< 0.1 mg/L
2,4,6-Trichlorophenol	0.1 mg/L	< 0.1 mg/L



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8241-1
ANALYSIS METHOD : EPA 1311/8270

PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Nitrobenzene-d5 (SS)	50.0 µg/L	99.1 %
2-Fluorobiphenyl (SS)	50.0 µg/L	96.6 %
Terphenyl-d14 (SS)	50.0 µg/L	99.0 %
Phenol-d5 (SS)	100 µg/L	96.2 %
2-Fluorophenol (SS)	100 µg/L	92.4 %
2,4,6-Tribromophenol (SS)	100 µg/L	93.9 %

NDRC Laboratories, Inc.

Martin Jeffus

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 20-JUL-1993

REPORT NUMBER : D93-8241-1
REPORT DATE : 28-JUL-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : COA-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 19-JUL-1993
PREPARATION METHOD : EPA 1311
PREPARED BY : TLR
PREPARED ON : 22-JUL-1993
ANALYSIS METHOD : EPA 1311/8240
ANALYZED BY : NTT
ANALYZED ON : 23-JUL-1993
DILUTION FACTOR : 1

TCLP VOLATILE ORGANICS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Benzene	0.01 mg/L	0.02 mg/L
Carbon tetrachloride	0.01 mg/L	< 0.01 mg/L
Chlorobenzene	0.01 mg/L	< 0.01 mg/L
Chloroform	0.01 mg/L	< 0.01 mg/L
1,4-Dichlorobenzene	0.01 mg/L	< 0.01 mg/L
1,2-Dichloroethane	0.01 mg/L	< 0.01 mg/L
1,1-Dichloroethene	0.01 mg/L	< 0.01 mg/L
Methyl ethyl ketone	1.00 mg/L	< 1.00 mg/L
Tetrachloroethene	0.01 mg/L	< 0.01 mg/L
Trichloroethene	0.01 mg/L	< 0.01 mg/L
Vinyl chloride	0.02 mg/L	< 0.02 mg/L



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8241-1
ANALYSIS METHOD : EPA 1311/8270

PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Nitrobenzene-d5 (SS)	50.0 µg/L	99.1 %
2-Fluorobiphenyl (SS)	50.0 µg/L	96.6 %
Terphenyl-d14 (SS)	50.0 µg/L	99.0 %
Phenol-d5 (SS)	100 µg/L	96.2 %
2-Fluorophenol (SS)	100 µg/L	92.4 %
2,4,6-Tribromophenol (SS)	100 µg/L	93.9 %

NDRC Laboratories, Inc.



Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8241-1
ANALYSIS METHOD : EPA 1311/8240

PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
1,2-Dichloroethane-d4(SS)	50.0 $\mu\text{g/L}$	88.3 %
Toluene-d8(SS)	50.0 $\mu\text{g/L}$	104 %
Bromofluorobenzene(SS)	50.0 $\mu\text{g/L}$	97.4 %

NDRC Laboratories, Inc.



Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 20-JUL-1993

REPORT NUMBER : D93-8241-1
REPORT DATE : 28-JUL-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : COA-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 19-JUL-1993
PREPARATION METHOD : EPA 3550
PREPARED BY : TLR
PREPARED ON : 21-JUL-1993
ANALYSIS METHOD : EPA 8000
ANALYZED BY : JMT
ANALYZED ON : 22-JUL-1993
DILUTION FACTOR : 100

TOTAL PETROLEUM HYDROCARBON BY GC		
TEST REQUESTED	DETECTION LIMIT	RESULTS
TPH as C8 - C32	1000 mg/Kg	11000 mg/Kg

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
o-Terphenyl (SS)	25.0 mg/L	69.7 %

NDRC Laboratories, Inc.

Martin Jeffus

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 20-JUL-1993

REPORT NUMBER : D93-8241-1

REPORT DATE : 28-JUL-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : COA-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 19-JUL-1993
ANALYSIS METHOD : EPA 5030/8015
ANALYZED BY : VLH
ANALYZED ON : 21-JUL-1993
DILUTION FACTOR : 500

TRPH BY EPA METHOD MODIFIED 8015		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon	25000 $\mu\text{g/Kg}$	560000 $\mu\text{g/Kg}$

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Fluorobenzene	50.0 $\mu\text{g/Kg}$	106 %

NDRC Laboratories, Inc.

Martin Jeffus

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 20-JUL-1993

REPORT NUMBER : D93-8241-1
REPORT DATE : 28-JUL-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : COA-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 19-JUL-1993

TCLP METALS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Silver	0.01 mg/L	< 0.01 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 21-JUL-1993 by CCM Analyzed using EPA 6010 on 22-JUL-1993 by KJS		
Arsenic	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 21-JUL-1993 by CCM Analyzed using EPA 6010 on 22-JUL-1993 by KJS		
Barium	0.1 mg/L	1.6 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 21-JUL-1993 by CCM Analyzed using EPA 6010 on 22-JUL-1993 by KJS		
Cadmium	0.01 mg/L	< 0.01 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 21-JUL-1993 by CCM Analyzed using EPA 6010 on 22-JUL-1993 by KJS		
Chromium	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 21-JUL-1993 by CCM Analyzed using EPA 6010 on 22-JUL-1993 by KJS		
Mercury	0.001 mg/L	< 0.001 mg/L
Dilution Factor : 1 Prepared using EPA 1311/7470 on 21-JUL-1993 by CCM Analyzed using EPA 7470 on 22-JUL-1993 by SKW		



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT NUMBER : D93-8241-1

PAGE 2

TCLP METALS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Lead	0.02 mg/L	1.44 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 21-JUL-1993 by CCM Analyzed using EPA 6010 on 22-JUL-1993 by KJS		
Selenium	0.05 mg/L	< 0.05 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 21-JUL-1993 by CCM Analyzed using EPA 6010 on 22-JUL-1993 by KJS		

NDRC Laboratories, Inc.

Martin Jeffus

Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 20-JUL-1993

REPORT NUMBER : D93-8241-1
REPORT DATE : 28-JUL-1993

SAMPLE SUBMITTED BY : Dames & Moore
ADDRESS : 4601 Charlotte Park Dr.
: Charlotte, NC 28217
ATTENTION : Mr. Ben Skelton

SAMPLE MATRIX : Soil
ID MARKS : COA-1
: Charlotte, NC
PROJECT : Exxon Terminal #4116
DATE SAMPLED : 19-JUL-1993

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
pH		6.2
Analyzed using EPA 9045 on 21-JUL-1993 by CLM		
Total Solids	0.01 %	84.9 %
Analyzed using EPA 160.3 on 22-JUL-1993 by CLM		

NDRC Laboratories, Inc.



Martin Jeffus
General Manager



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED: 20-JUL-1993

REPORT NUMBER: D93-8241

REPORT DATE: 28-JUL-1993

SUBMITTED BY: Dames & Moore

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Arsenic	Selenium	Barium	Cadmium	Chromium	Lead
BATCH No.	2842	2842	2842	2842	2842	2842
MATRIX	Soil	Soil	Soil	Soil	Soil	Soil
PREP METHOD	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA1311/3015	EPA 1311/3015	EPA 1311/3015
PREP DATE	7/21/93	7/21/93	7/21/93	7/21/93	7/21/93	7/21/93
PREP TECHNICIAN	CCM	CCM	CCM	CCM	CCM	CCM
ANALYSIS METHOD	EPA 6010	EPA 6010	EPA 6010	EPA 6010	EPA 6010	EPA 6010
ANALYSIS DATE	7/22/93	7/22/93	7/22/93	7/22/93	7/22/93	7/22/93
ANALYST	KJS	KJS	KJS	KJS	KJS	KJS
METHOD BLANK	< 0.05 mg/L	< 0.05 mg/L	< 0.10 mg/L	< 0.01 mg/L	< 0.05 mg/L	< 0.02 mg/L
MS % RECOVERY	83.5	101	---- **	---- **	---- **	---- **
LCS % RECOVERY	---- *	---- *	108	103	98.7	---- *
DUPLICATE RPD	----	----	12.5	----	----	----
MS/MSD RPD	8.05	5.08	----	----	----	----
SPIKE LEVEL	2.00 mg/L	2.00 mg/L	2.00 mg/L	0.10 mg/L	0.50 mg/L	0.50 mg/L
SPIKED SAMPLE ID No.	D93-8291-7	D93-8291-7	D93-8291-7	D93-8291-7	D93-8291-7	D93-8291-7
DUPLICATE SAMPLE ID No.	D93-8291-7	D93-8291-7	D93-8291-7	D93-8291-7	D93-8291-7	D93-8291-7

MS: Matrix Spike
MSD: Matrix Spike Duplicate
LCS: Laboratory Control Sample
RPD: Relative Percent Difference

COMMENTS: * This analyte was not included in the LCS and/or spike mixture.

** Strong matrix interference. MS and MSD spikes were not recovered.



Inchcape Testing Services

NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED: 20-JUL-1993

REPORT NUMBER: D93-8241

Page 2 of 2

SUBMITTED BY: Dames & Moore

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Silver	Mercury	pH	Total Solids	TPH	TPH
BATCH No.	2842	2841	----	----	22	----
MATRIX	Soil	Soil	Soil	Soil	Soil	Soil
PREP METHOD	EPA 1311/3015	EPA 1311/7470	----	----	EPA 3550	EPA 5030
PREP DATE	7/21/93	7/21/93	----	----	7/21/93	7/21/93
PREP TECHNICIAN	CCM	CCM	----	----	TLR	VLH
ANALYSIS METHOD	EPA 6010	EPA 7471	EPA 9045	EPA 160.3	EPA 8000	EPA 8015
ANALYSIS DATE	7/22/93	7/22/93	7/21/93	7/22/93	7/21/93	7/21/93
ANALYST	KJS	SKW	CLM	CLM	JMT	VLH
METHOD BLANK	< 0.01 mg/L	< 0.001 mg/L	----	----	< 10.0 mg/Kg	< 50.0 µg/Kg
MS % RECOVERY	82.0	82.2	----	----	---- *	120
LCS % RECOVERY	90.6	86.7	----	----	112	94.0
DUPLICATE RPD	----	----	0.00	0.10	----	----
MS/MSD RPD	5.00	3.58	----	----	---- *	9.57
SPIKE LEVEL	0.10 mg/L	0.010 mg/L	----	----	83.3 mg/Kg	250 µg/Kg
SPIKED SAMPLE ID No.	D93-8291-7	D93-8291-6	----	----	D93-8240-2	D93-8109-2
DUPLICATE SAMPLE ID No.	D93-8291-7	D93-8291-6	D93-8244-6	D93-8197-1	----	----

MS: Matrix Spike
MSD: Matrix Spike Duplicate
LCS: Laboratory Control Sample
RPD: Relative Percent Difference

COMMENTS: * Spike lost to sample matrix interference.

07/23/93



NDRC LABORATORIES, INC.

A member of Inchope Environmental

1089 East Collins Blvd., Richardson, Texas 75081 • (214) 238-5591 • FAX (214) 238-5592

BEAUMONT

DALLAS

HOUSTON

D93 - 82321 MS + MSD

3A

WATER VOLATILE MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name: NDRC Laboratories, Inc.Contract: TCLP Volatiles

Lab Sample Number: _____

EPA No.: _____

COMPOUND	SPIKE ADDED (ug/L)	SAMPLE CONC. (ug/L)	MS CONC. (ug/L)	MS % REC.	QC LIMITS REC.
Vinyl Chloride	100.00	0.0	65.4	65.4	61-125
1,1-Dichloroethene	100.00	↓	84.4	84.4	61-125
2-Butanone	100.00	98.0	217	119	70-125
Chloroform	100.00	0.0	96.6	96.6	70-125
1,2-Dichloroethane	100.00		94.0	94.0	70-125
Trichloroethene	100.00		108	108	70-125
Benzene	100.00		102	102	70-125
Carbon Tetrachloride	100.00		97.4	97.4	70-125
Tetrachloroethene	100.00		113	113	70-125
Chlorobenzene	100.00		106	106	70-125
1,4-Dichlorobenzene	100.00	↓	116	116	70-125

COMPOUND	SPIKE ADDED (ug/L)	MSD CONC. (ug/L)	MSD % REC.	% RPD	QC LIMITS RPD	REC.
Vinyl Chloride	100.00	70.3	70.3	7	15	61-125
1,1-Dichloroethene	100.00	92.4	92.4	9	15	61-125
2-Butanone	100.00	206	108	10	15	70-125
Chloroform	100.00	101	101	4	15	70-125
1,2-Dichloroethane	100.00	99.6	99.6	6	15	70-125
Trichloroethene	100.00	109	109	1	15	70-125
Benzene	100.00	104	104	2	15	70-125
Carbon Tetrachloride	100.00	107	107	9	15	70-125
Tetrachloroethene	100.00	117	117	3	15	70-125
Chlorobenzene	100.00	111	111	5	15	70-125
1,4-Dichlorobenzene	100.00	119	119	3	15	70-125

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 11 outside of limitsSpike Recovery: 0 out of 22 outside of limits

COMMENTS: _____

3C
WATER SEMIVOLATILE MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name: NDRC

Contract: TCLP 4

Lab Code: HP004

Case No.: AD-76

SAS No. E 7/19/93

SDG No. A 7/21/93

Matrix Spike - EPA Sample No.: 8121-3 3580_B19

COMPOUND	SPIKE ADDED (ug/L)	SAMPLE CONCENTRATION (ug/L)	MS CONCENTRATION (ug/L)	MS % REC #	QC LIMITS REC.
Pyridine	1000.00	0.00	0.00	0 *	10-120
2-Methylphenol	1000.00	0.00	890.00	89	10-145
Nitrobenzene	1000.00	0.00	1020.00	100	40-150
2,4,6-Trichlorophenol	1000.00	0.00	920.00	92	40-150
2,4-Dinitrotoluene	1000.00	0.00	940.00	94	40-150
Hexachlorobenzene	1000.00	0.00	880.00	88	35-115
Pentachlorophenol	1000.00	0.00	830.00	83	20-130

COMPOUND	SPIKE ADDED (ug/L)	MSD CONCENTRATION (ug/L)	MSD % REC #	% RPD #	QC LIMITS RPD	REC.
Pyridine	1000.00	0.00	0 *	0	50	10-120
2-Methylphenol	1000.00	900.00	90	1	15	10-145
Nitrobenzene	1000.00	950.00	95	4	40	40-150
2,4,6-Trichlorophenol	1000.00	900.00	90	2	40	40-150
2,4-Dinitrotoluene	1000.00	900.00	90	4	40	40-150
Hexachlorobenzene	1000.00	850.00	85	2	20	35-115
Pentachlorophenol	1000.00	880.00	88	5	40	20-130

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of qc limits

RPD: 0 out of 7 outside limits

Spike Recovery: 2 out of 14 outside limits

COMMENTS: SW-846 EPA METHOD 8270

Level I QC CHAIN OF CUSTODY RECORD

Inchcape Testing Services

EXXON Company, USA
Regional Laboratory Program
ORIGINAL

NDRC Laboratories

1089 East Collins Blvd, Richardson, Texas 75081 (214) 238-5591 (Voice), (214) 238-5592 (Fax)
Attn: Belinda Feuerbacher, Project Director

Consultant's Name : <u>DAMES AND MOORE</u>						Page <u>1</u> of <u>1</u>											
Address : <u>4601 Charlotte Park Dr. STE 320 CHARLOTTE, NC 28217</u>																	
Project : <u>EXXON</u>				Consultant Proj # :				Consultant Work Release # : <u>93024025</u>									
Project Contact : <u>BEN SKELTON</u>				Phone : <u>704-522-0330</u> Fax : <u>704-522-0063</u>				Laboratory Work Release # : <u>93043440</u>									
Alternate Contact : <u>STEVE HART</u>				Phone : <u>SAME</u> Fax : <u>SAME</u>				Site Location : <u>CHARLOTTE, NC</u>									
EXXON Contact : <u>JERRY CRAWFORD</u> EE (C&M) (circle one)				Phone : <u>704-529-4233</u> Fax : <u>704-522-4248</u>				EXXON TAG # : <u>TERMINAL #4116</u>									
Sampled by (print) : <u>TIMOTHY B. SKELTON</u>						Sampler's Signature : <u>Timothy B. Skelton</u>											
Shipment Method : <u>BURLINGTON AIR</u>			Air Bill # : <u>54763684</u>			ANALYSIS REQUIRED Number of Containers						Sample Condition as Received Temperature °C : <u>4</u> Cooler # : <u>E500N</u> Inbound Sealed Yes No Outbound Sealed <u>Yes</u> No					
Shipment Date : <u>7-19-93</u>																	
SAMPLE ID	DATE	TIME	MATRIX WATER/ SOIL	PRSV Y/N	SAMPLE LOCATION/ DESCRIPTION	TEL TEL TEL	VOC	SUC	TPH 5030	TPH 3530	PH			COMMENTS			
<u>COA-1</u>	<u>7-19-93</u>	<u>1000</u>	<u>SOIL</u>	<u>N</u>		<u>3</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>PH</u>	<u>8241</u>	<u>-1</u>				
<u>SP-15A</u>	<u>11</u>	<u>1700</u>	<u>11</u>	<u>11</u>	<u>STOCKPILE #15</u>	<u>X</u>	<u>ZL</u>					<u>TPH 5030</u>	<u>7-27-93</u>	<u>FOR SP-15A, B, & C</u>			
<u>SP-15B</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>X</u>	<u>ZL</u>					<u>TPH 5030</u>	<u>7-29-93</u>	<u>ONLY ANALYZE FOR</u>			
<u>SP-15C</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>X</u>	<u>ZL</u>							<u>TPH 5030 + 3530</u>			
														<u>NEED 24-hr TURNAROUND</u>			
														<u>ON SP-15A, B, & C</u>			
														<u>STANDARD TURNAROUND</u>			
														<u>ON COA-1</u>			
														<u>8000ES - per Claudia</u>			
Turn around time <input type="checkbox"/> 24 hr <input type="checkbox"/> 48 hr <input type="checkbox"/> 72 hr <input type="checkbox"/> Standard <input checked="" type="checkbox"/> Other <u>SEE COMMENTS</u>						Total # of Containers : <u>9</u>											
(1) Relinquished by Signature <u>Timothy B. Skelton</u>			Date <u>7/17/93</u>			(2) Relinquished by Signature			Date			(3) Relinquished by Signature			Date		
Company : <u>Dames & Moore</u>			Time : <u>1900</u>			Company :			Time :			Company :			Time :		
(1) Received by Signature <u>Chris Boston</u>			Date <u>7/20/93</u>			(2) Received by Signature			Date			(3) Received by Signature			Date		
Company : <u>Inchcape</u>			Time : <u>9:30</u>			Company :			Time :			Company :			Time :		

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

SITE SAFETY PLAN (SSP)

I. PRE-ACTIVITY SECTION

(A) Facility name: Exxon EPA ID# NC0056478500
 Address: 6501 Freedom Drive Phone# (704)
Rose Creek NC 28120
 Contact: Mr. Jerry Thacker Phone# _____
 SSP Prepared By: Philip Ray Date(s) 6/1/73

(B) Site Visit *	Inspection Type	Checklist **	On-Site Safety*
Date(s)	(CME, RFA, ETC.)	Modified date(s)	Designee
<u>6/1/73</u>	<u>CET</u>	_____	_____
_____	_____	_____	_____

- * Date(s) before/during field activity.
- ** Place a double asterisk (**) and date(s) after all modified information, or attach extra page(s).
- *** IMPORTANT all activities conducted at RCRA facilities/sites shall require the consent of on-site Safety Designee/Contact.

(C) SITE TOPOGRAPHY: Mountains _____ Rivers _____ Valley _____ Level _____
 Slopes Urban _____ Facility Others _____

Special Access Requirements: _____

(D) EMERGENCY INFORMATION

Ambulance: Ambulance Service of Charlotte Telephone# 911
 Hospital: University Hospital Telephone# 548-6000
 Police: Charlotte Police Telephone# 911
 Fire Department Charlotte P.D. Telephone# 911
 Fire and Emergency Signals reviewed OK
 Site Evacuation plan reviewed OK

E) INFORMATION SOURCES

Part B: _____ State: _____ * Contingency Plan:

Part A: _____ RFA/I: _____ Closure Plan: _____

*Facility Safety Plan _____ Other: _____

*Request copy of Facility Safety/Contingency Plan for reference.

(F) PERMITS

Hazardous Waste: _____ NA Status: _____ NA

Water: N/A Air: Air Permit Other: _____

Summary of Regulated Units and SWMUS:

(Indicate number of units)

Landfills: _____ NA Incinerators: _____ NA Storage areas: _____

Surface: _____ NA Tank farms: Produce material Other: _____ NA

Waste Piles: _____ NA Other Treatment: NA SWMUS: _____ NA

(G) FACILITY PROCESS DESCRIPTION

Briefly describe the facility production process:

*Product is shipped in to us via plantation
pipe line to our storage tanks
and in turn is loaded out on
tank trucks through our loading
dock for service stations in
surrounding areas.*

(H) HEALTH AND SAFETY CONSIDERATIONS

Briefly identify hazard type/potential; describe on last page of section

(I) if necessary:

Area of Concern

Hazard Potential (1)

Fire and Explosion

high

Oxygen Deficiency (e.g. confined spaces)

low

Ionizing Radiation

N/A

Biological

N/A

(I) Previous Releases, Accidents or Complaints:

Corrected

(yes/no)

Air, Soil, or Surface Water _____

yes

Industrial Accidents _____

no

Complaints _____

yes

(J) Air/Environmental Monitoring Program.

Air Monitoring Type

Conducted by

Areas/tasks where needed

(yes/no)

Toxic yes

Facility Charlotte

Bengene Top (all)

Contractor _____

Other _____

Explosive/no
oxygen

Facility _____

Contractor _____

Other _____

Radiation no

Facility _____

Contractor _____

Other _____

None _____

(if none explain)

EPA ID: NC 0056478506

Submitted by: _____ Date: _____

Entered by: _____ Date: _____

Facility Name: Exxon Terminal City: New Creek

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: S Date: 06/01/93 Type: CET

Control Number Data Entry Personnel

Person: 027 Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators	
GER	<input checked="" type="checkbox"/>
GGR	<input checked="" type="checkbox"/>
GLB	<input checked="" type="checkbox"/>
G&Q	<input type="checkbox"/>
GMR	<input checked="" type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input checked="" type="checkbox"/>
GRR	<input checked="" type="checkbox"/>
GSC	<input type="checkbox"/>

Transporters	
TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's					
DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>
DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>
DCP	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>
DFR	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>
DGS	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>
DGW	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
DIN	<input type="checkbox"/>	DOT	<input type="checkbox"/>		

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:

(72) 1: Unannounced Inspection - No violations noted

2: _____

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -

RCRA INSPECTION REPORT

1) Facility Name:

ID Number: NCD 056478506

Type of facility: LAG

Ownership: Exxon Terminal

Contact: Mr. Jerry Thacker

Phone number: (704) 394-5696

Facility location (address): Highway 27 (6501 Freedom Drive)

City, state, zip: Paw Creek, N.C. 28126

2) Survey Participants:

Mr. Philip Day Mr. George Rangan
Mr. Jerry Thacker

3) Date of Inspection: 6/1/03

4) Purpose of Inspection: Unannounced inspection to determine compliance with

5) Facility Description: 40 CFR 260, 265, and 268.

Processes: The facility is a fuel terminal. Waste is only generated from cleaning and usual maintenance of tank.

Type Waste:

- ① Spill out Absorbents (D015)
- ② Hazardous Waste Solid (D011, D014)
- ③ Waste Combustible Liquid (D015)
- ④ Waste Paint Related Material (D011, F003, F005)

Transporters:

- ① Freight Carriage (NJD 054 126 129)
- ② Dart Trucking (OH0 009 865525)
- ③ Safety-Kleen (TL02051060406)

TSD's:

- ① Thermal-Kem Inc. (SL0 040 442 333)
- ② Safety-Kleen (SL0 077 995 488)
- ③ Safety-Kleen (KYD 053 348 108)
- ④ Enso (AR0 069 743 192)

Accumulation areas:

No waste on-site

Storage areas:

No waste on-site.

Facility Name: Exxon
ID #: NE056578506

6) Waste Minimization:

- 1) Facility ships waste water to refinery for organic recovery.
- 2) Facility uses new technology to clean tank bottoms so there is no hazardous waste tank bottoms.

7) Site Deficiencies:

No violations noted

8) Recommendations:

Signed:

Philip D. [Signature]
Inspector/Reviewer

[Signature]
Facility Contact

6/1/93
Date

RCRA INSPECTION FIELD NOTES- GENERATOR

C = copies made; * = violation; P = photo taken

Facility Name: Exxon
Address: 6801 Breakham Drive (Hwy. 27) Paw Creek, N.C. 28130
ID #: NCD056478506
Inspection Date: 6/1/93 Last Inspection 9/3/92
Contact: Mr. Phillip DeF, Mr. Jerry Thacker Type of Inspection CEF
Present at Inspection: Mr. Phillip DeF, Mr. Jerry Thacker

Type of business: Fuel terminal

Processes: Changing and repairing equipment, water bottles

Wastes Generated: 1) Soil and Absorbent pads contaminated with Diesel Fuel (D018)
2) Hazardous waste Solid (D001, D018) 3) Waste Paint Related Material (D001, P003, P005)
3) Waste Combustible Liquid (D018) (antifreeze)

Transporters:
1) Freight Carriage (NJ0054126164)
2) Dart Trucking (OH0009865825)
3) Safety-Kleen (IL0051060408)

TSD's
1) Safety-Kleen (SC0077995488)
2) Safety-Kleen (KY0053398108)
3) Enso (AR0069798192)

Division Transport (AR0069798506)

Manifests:
Signed Copies? OK
Treatment Standards? OK
OK

Filled out correctly? OK

Inspection Records: OK

Contingency Plan:
Actions for spills/fires? OK Agreements with emergency contacts? OK
Em. coords updated? OK Name, address, phone for em. coords? OK
Emerg equip/location/alarms? OK Report on use of conting. plan? No
Evacuation plan/signals/primary/secondary? OK

Training Records:
Last training? 12/1/92 Em coord.s and appropriate people trained? OK
Job Title? OK Job description? OK
Content? OK Sign off? OK
OK

Annual Report: OK
Waste analysis (TCLP): NA
Accumulation Areas: Description: No waste on-site

Closed/labeled/dated/< 55 gallons?
Storage Areas: Description: No waste on-site

Closed/labeled/dated/< 90 days/good condition?

Violations are:
Class II (NOV)
Class I (FILL OUT COMPLIANCE ORDER FORM).

RCRA INSPECTION REPORT

1) Facility Information

Exxon Terminal # 4116
Highway 27
Paw Creek
NCD 056 478 506

2) Facility Contact

Edward "Gene" Burris

3) Survey Participants

Gene Burris Spicy Allen

4) Date of Inspection

9/3/91

6) Purpose of Survey

Records Review and facility inspection to determine compliance with 40CFR 262.

7) Facility Description

Exxon Terminal #4116 is a storage and distribution terminal for gasoline, diesel, and other petroleum fuels. Hazardous waste is generated during tank cleanout. Wastes manifested to Oldover NCD000773655-

1-24-91. under waste codes D001, D018, F003, F005, Manifest # 12189. No LDR Notification was attached to the manifest, however this was corrected by FAX from Oldover.

7-19-91 - 38 drums of waste were shipped under a Non HW manifest to Clean Harbors of Baltimore MDD 980 555 189. 2 of the 38 drums were rejected and remain on site at Clean Harbors. Lab results show higher than "normally expected" levels of Toluene, Xylene, and CH hydrocarbons for this waste stream. Additional analysis are being conducted. From facility inspection, spent, Fluorinated solvents have NOT been introduced into this waste, concluded from normal operations

DH324 inspection. During the inspection a phone conversation took place with Clean Harbors Personnel, David Proulx, Martha Rooney (Lab) and Rich Waddington (compliance mgr) due to discrepancy Clean Harbors will treat the waste as used oil and address the limitations for waste oil in their handling, treatment, and disposal of the waste.

The facility has conducted emergency response drills with F-12
① ruptured tank line 5-31-90 ② Spill response 10-28-90.

8) Waste Minimization

Facility uses a vapor recovery system for loading rack emissions control.

Facility is using "Terminal Technologies Inc." as a new process for recovery from tank bottoms.

9) Site Deficiencies

262.20(a) Manifest # 12189 notes F003, F005 waste codes, spent solvents are not a part of this waste stream but xylene and toluene are constituents of product. generating waste

268.7(a)(6) Notification of Land Disposal restriction was not retained on site for manifest # 12189. This violation was corrected during the inspection by FAX copy from Ulclover Corp.

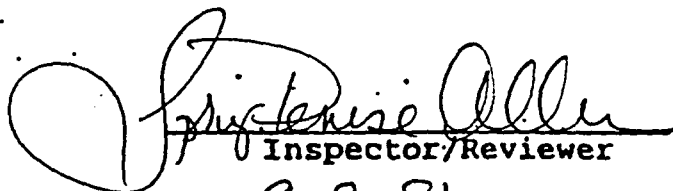
265.54(c) The contingency plan has not been updated to reflect design changes and construction changes which took place in 1990

265.52(f) The contingency plan does not include an emergency evacuation plan.

10) Recommendations

Submit amended copies of the contingency plan to appropriate emergency agencies as per 40CFR 265.53(b)

11) Signed


Inspector/Reviewer

9-3-91

Date


Facility Contact

Region IV CM&E Form - Side A

EPA ID: **NCDC056978506**

Submitted by: _____ Date: _____

Entered by: _____ Date: _____

Facility Name: **Exxon Terminal #4116** City: **PAWCREEK (Charlotte)**

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: **S** Date: **Mo: 09 / Day: 03 / Year: 91** Type: **CEI**

Control Number Data Entry Personnel

Person: **0601** Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators	
GER	<input checked="" type="checkbox"/>
GGR	<input type="checkbox"/>
GLB	<input type="checkbox"/>
GLO	<input type="checkbox"/>
GMR	<input type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input type="checkbox"/>
GRR	<input type="checkbox"/>
GSC	<input type="checkbox"/>

Transporters	
TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's					
DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>
DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>
DCP	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>
DFR	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>
DGS	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>
DGW	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
DIN	<input type="checkbox"/>	DOT	<input type="checkbox"/>		

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

VIOLATION DATA: New: Change: Delete:

1 Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

_____ Agency: Type: **CEI** Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -

NOV 23



5 Pages

State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION
Docket #

Mr Edward E. Burris
Exxon Terminal #4116
Paw Creek, N.C. 28214

NCD 056 478 506

Dear Mr. Burris

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (Act), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A, (Rules) in lieu of the federal RCRA program. *Exxon Terminal #4116 on Paw Creek*, North Carolina is classified as a generator of hazardous waste and is subject to the requirements of 40 CFR 262 codified at 15A NCAC 13A .0007.

In addition, *Exxon Terminal #4116* is subject to the current prohibitions on land disposal of hazardous waste, effective November 8, 1986, that applies to spent solvent wastes F001/F005; effective July 8, 1987 for the "California List Wastes"; and effective August 8, 1988 for the "First Third" listed wastes; effective June 8, 1989, for the "Second Third" listed wastes; and effective May 8, 1990, for the "Third Third" listed wastes.

On *September 3, 1991*, *Ms Spring Allen*, Waste Management Specialist with this office inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection the following violations, were noted:

Exxon Terminal # 4116

9/3/91 page 2 of 5

A 40 CFR 262.20(a), codified at 15A NCAC 13A .0007, states that a generator, who transports or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a Manifest OMB control #2050-0039 on EPA form 8700-22 and, if necessary, EPA form 8700-22A, according to the instructions included in the Appendix to Part 262.

Exxon Terminal # 4116 is in violation of 40 CFR 262.20(a), codified at 15A NCAC 13A .0007, in that ~~Hunt Manufacturing~~ Exxon #4116 Company offered for transportation, hazardous waste for off-site treatment, storage, or disposal and did not prepare a Manifest OMB control number 2050-0039 on EPA form 8700-22.

according to the instructions included in the Appendix to Part 262, specifically waste was misidentified with inappropriate codes denoting F listed solvents.

B 40 CFR 262.34(a)(4), 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 generator complies with Subparts C and D in 40 CFR Part 265 and with Section 265.16.

1 40 CFR 265.54(c) codified at 15A NCAC 13A .0010, states that the contingency plan must be reviewed, and immediately amended, if necessary, whenever

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;

Exxon Terminal # 4116 is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, and referenced at 40 CFR 265.54(c), codified at 15A NCAC 13A .0010 in that it failed to amend the contingency plan to reflect construction and design changes which changes the response necessary in an emergency.

Exxon Terminal #4116
9/3/91 Page 3 of 5

2 40 CFR 265.52(f), codified at 15A NCAC 13A .0010, states that the contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires):

Exxon Terminal #4116 is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.52(f), codified at 15A NCAC 13A .0010, in that the contingency plan did not include an evacuation plan for facility personnel where there is a possibility that evacuation would be necessary.

C 40 CFR 268.7(a)(6), 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 the 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.

Exxon Terminal #4116 is in violation of 40 CFR 268.7(a)(6), codified at 15A NCAC 13A .0012, in that it failed to retain on site a copy of notification of Land Disposal Restriction, specifically for Manifest # 12189. This violation was corrected during the inspection by a facsimile copy of the original notification, being sent from the TSD facility.

Exxon Terminal #4116

9/3/91 page 4 of 5

COMPLIANCE SCHEDULE

By _____, 1991, you shall comply with the following requirements.

A. Comply with 40 CFR 262.20(a), codified at 15A NCAC 13A .0007, by ensuring that all hazardous waste is properly manifested prior to transportation to an approved treatment, storage or disposal facility.

B Comply with 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, specifically:

1 By amending the contingency plan to include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. The evacuation plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires) as required in 40 CFR 265.52(f):

2 By amending the contingency plan to reflect *c'*... the *f.* changes in design and construction which took place in 1990 as required in 40CFR 265.54(c).

C Comply with 40CFR 268.7(a)(6), codified at 15A NCAC 13A.0012, by retaining on site copies 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 the 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.

Exxon Terminal #4116

page 5 of 5 9.3.91


If the requirements above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701-.0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

Sincerely,

Jerome H. Rhodes

Jerome H. Rhodes, Chief
Hazardous Waste Section

JHR/dd/KM119

cc: Keith Masters
Spring Ailen
Central Files


Al Hilton

Region IV CM&E Form - Side A

EPA ID: **NCD056978506**

Submitted by: _____ Date: _____

Entered by: _____ Date: _____

Facility Name: **Exxon Terminal #4116** City: **PAWCREEK (Charlotte)**

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: **S** Date: **09/03/91**

Type: **CEI**

Control Number Data Entry Personnel

Person: **0101** Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators

GER	<input checked="" type="checkbox"/>
GGR	<input type="checkbox"/>
GLB	<input type="checkbox"/>
GLO	<input type="checkbox"/>
GMR	<input type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input type="checkbox"/>
GRR	<input type="checkbox"/>
GSC	<input type="checkbox"/>

Transporters

TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's

DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>
DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>
DCP	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>
DFR	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>
DGS	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>
DGW	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
DIN	<input type="checkbox"/>	DOT	<input type="checkbox"/>		

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

VIOLATION DATA: New: Change: Delete:

1 Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: **3/mk** Date (mdy) Determined: / / Class:

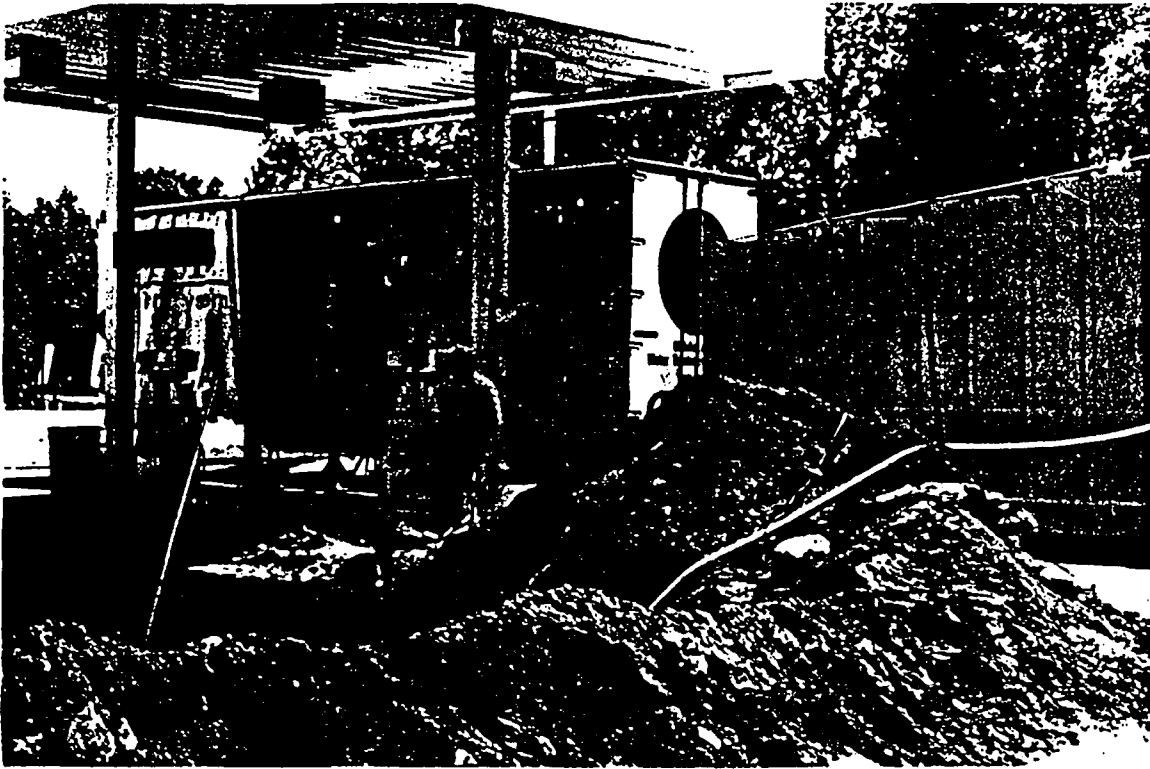
Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -



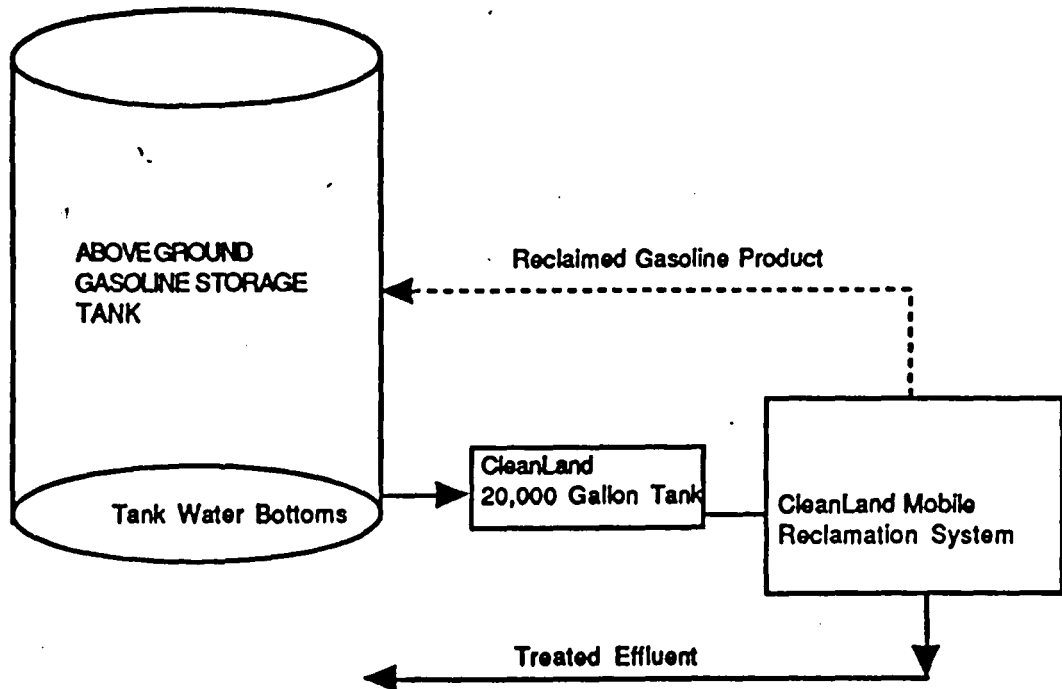
CLEANLAND
Mobile Treatment Systems

Sami A. Fam, Ph.D., P.E.
Principal

1158 North Main Street, Raynham, Massachusetts 02767
Telephone: 508-823-1184



RECLAMATION MAKES SENSE AND SAVES MONEY !!!!!!!



**TANK WATER BOTTOM
MANAGEMENT AND
RECLAMATION**

1 WHAT IS TANK WATER BOTTOM RECLAMATION?

Tank water bottoms are now considered a hazardous waste because they will generally fail the TCLP testing procedures. The CleanLand Reclamation/Treatment Systems allow you to recover the dissolved gasoline constituents in the tank water bottoms and to simultaneously treat the water to acceptable discharge criteria. This saves you significant amount of money instead of disposal of the water as a hazardous waste.

2 ARE YOU ALLOWED TO RECLAIM TANK WATER BOTTOMS ?

YES. As long as you reuse the reclaimed product by putting it back into a bulk storage tank, CleanLand's activities are classified as recycling rather than treatment of a hazardous waste and consequently are only subject to the particular state's recycling regulations. CleanLand offers you all PERMITTING SUPPORT AT NO CHARGE. We can be permitted to operate at your site within 10-30 days.

3 HOW DO YOU RECLAIM THIS WATER ?

We adsorb the dissolved gasoline constituents onto gas phase, steam regenerable activated carbon and subsequently desorb the gasoline with steam and store the recycled product in drums. The treated water (can be recycled to meet any discharge criteria) is subsequently discharged.

4 DOES CLEANLAND HAVE EXPERIENCE WITH THIS PROCESS ?

YES. CleanLand is currently the only contractor locally as well as nationally offering clients on-site reclamation of tank water bottoms. Our services to you for tank bottom reclamation include:

- Permitting support
- On-site reclamation
- On-site analytical service (trailers contain a lab area)

5 WHAT ARE THE COSTS ASSOCIATED WITH THIS PROCESS ?

We can typically conduct these activities for \$0.10 to \$0.25 /gallon depending upon the volume to be recycled and concentrations in the tank water. Disposal costs range between \$0.50 to \$1.00 /gallon !

6 FOR MORE INFORMATION CONTACT:

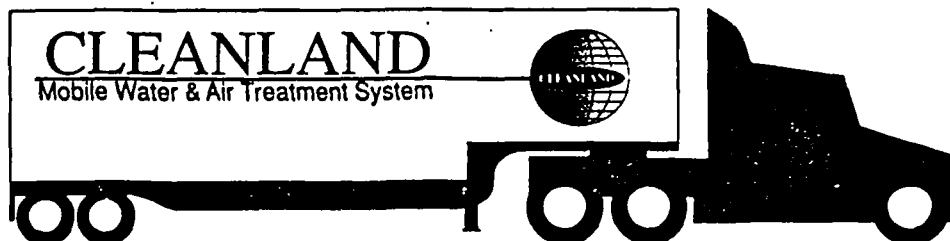
Dr. Sami Fam, P.E.
508-823-1184



CLEANLAND

Mobile Water & Air Treatment System

CleanLand Corporation operates a fleet of mobile treatment systems that clean contaminated soil, water and air. CleanLand's Mobile Water & Air Treatment System removes contaminants from aqueous and gaseous waste streams at hazardous waste sites and industrial locations. CleanLand services are used by engineering companies, industries and governmental agencies.



System Specifications:

- Water treatment capacity: 0 to 100 gpm
- Vapor treatment capacity: 650 cfm (99% efficiency)
- Steam treatment capacity: 150 °F (@ 650 cfm)
- Full water and vapor emission controls (regenerable carbon)
- 24 hour continuous operation
- Self Contained: Equipped with electrical and steam generator units, laboratory, water and vapor treatment equipment

Benefits of Using CleanLand Systems:

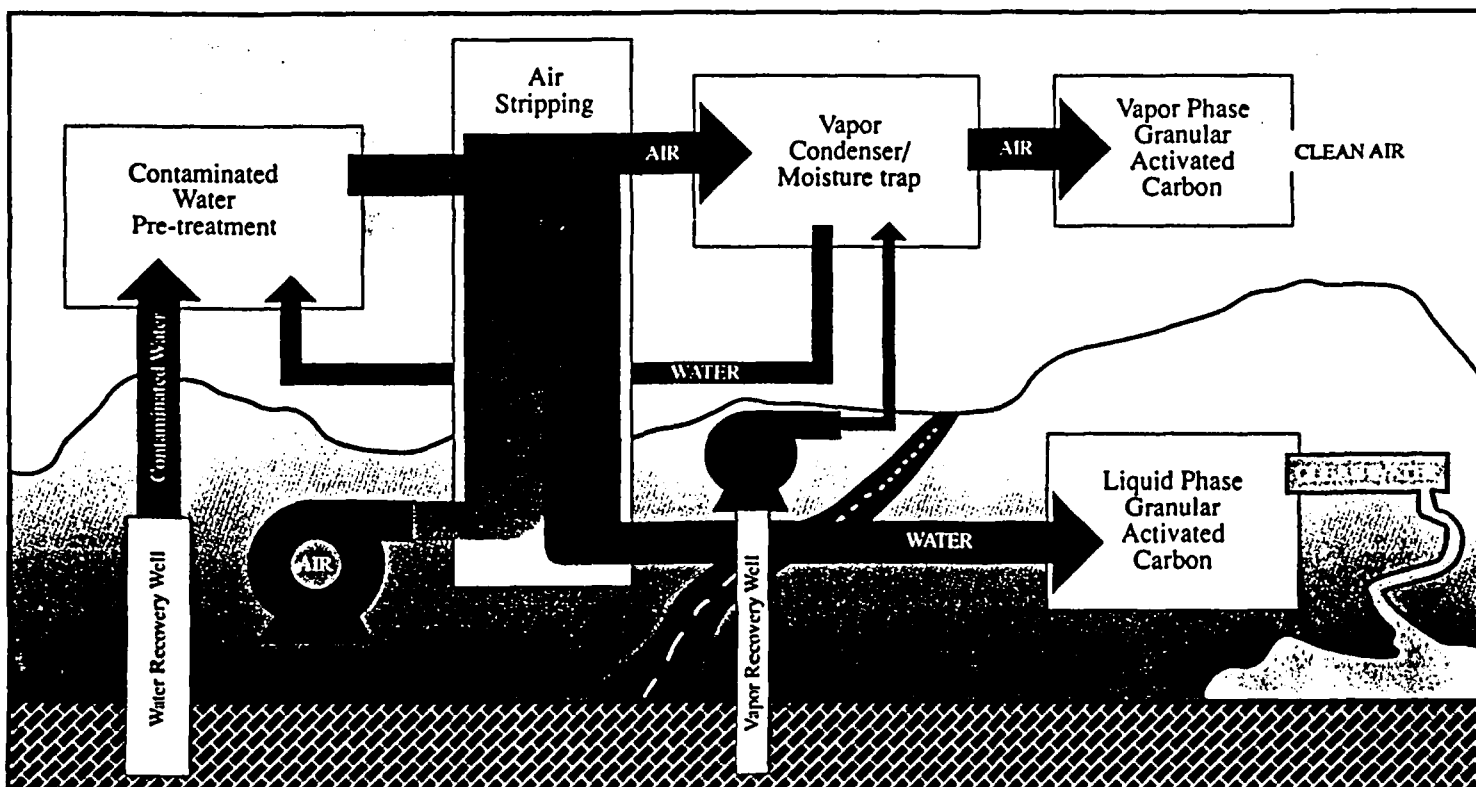
- Significant cost savings
- Minimal disposal liability (GAC regenerated on site)
- Rapid Response
- Proven technology (air stripping, GAC)
- On site analytical capability for influent & effluent

CleanLand Equipment is Used For:

- Treatment of VOC contaminated water
- Treatment of METALS contaminated water
- Treatment of VOC contaminated air

Specific Applications:

- Water well pump tests
- Soil vapor extraction tests
- Steam stripping tests
- Treatability tests
- Excavation dewatering
- Tank cleaning
- Pipe line testing



RECORD OF COMMUNICATION

PHONE CALL DISCUSSION FIELD TRIP CONFERENCE
 OTHER (SPECIFY)

(Record of item checked above)

TO: Exxon Terminal # 9116
 Hwy 27 Paw Creek

FROM: 12 employees 24 hr.
 4 terminal
 8 drivers
 919-529-4232
 Jerry Crawford Exxon Greensboro

DATE 9-2-91
 TIME 1045

SUBJECT CEI Field Notes. - Mr. Ed. Burrus "Gene" - Contact
 Steve Davis - Certified Coating Inspector

SUMMARY OF COMMUNICATION

Terminal Technologies - Full TCLP

15 Tanks on site - 297,000 barrels x 42 = Gallons. (plantation Pipeline)
 Plans are to clean all tanks w/in the next 4 yr period.

~~300 gal~~ -
 2-6-91 Annual Report - not waste generated in 1990 (on site)

1-24-91 manifested. 3000 gal. To Oldover - NCD 000 773 655.

WASTE # - F003, F005 - pool, DO18 - # 12189.

Discussion of inappropriate Flushing for this waste

No LAR Notification attached - to this manifest - corrected by FAT

7-19-91 - NON HW Manifest - Clean Harbors Kingston, Inc.
 Profile # 514690 - show DO18 TCLP to be determined
 Analysis not available

Log of inspections - while waste is on site weekly
 Accum Time - date X words ? awaiting
 Containers - closed condition insp log ✓ containers see photos

265.16 - Training - 5-23-91 - Job descriptions & training ✓

265.33 CONCLUSIONS, ACTION TAKEN OR REQUIRED
 Equip. Check b ✓ checked yearly by nonaffiliated Co.
 emerg coord - Gene Burrus, Mason Barnett. training ✓

265.52 - a ✓ b ✓ spec c ✓ arrangements d ✓ emerg coord e ✓ equip f ✓ X vac.

emergency drill - 10/28/90 - conducted - documented w/ FD

265.54(c) - Jac Cont plan has not been amended to reflect
 facility design changes. marked 1203

INFORMATION COPIES 18 Bags SW awaiting Determination / 2 tanks
 TO: Tables out tanks NON HW To be determined 8/28/91

RECORD OF COMMUNICATION

- PHONE CALL DISCUSSION FIELD TRIP CONFERENCE
 OTHER (SPECIFY)

(Record of item checked above)

TO:

FROM:

DATE

TIME

SUBJECT

Clean Harbors of Kingston, Inc. MAD 039 322 250

SUMMARY OF COMMUNICATION

Transported Waste on NonHW Manifest
to Clean Harbors of Baltimore, Inc. MDD 980 555 189
Drums were accepted 7/19/91 return non HW
manifest returned signed 7/30/91

Clean Harbors

David Proud, Martha Rooney Lab Mgr, Rich Waddington Comp Mgr
not spent solvents re Clean Harbors will analyze
as per 2060 regulations for "used" oil. Waste oil

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES

TO:

29986

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N.C.D05.6.4.785.0.6 Manifest Number 12189

2. Page 1 of 1 Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: EX ON TERMINAL # 4116, P.O. BOX 82, PAW CREEK, N.C. 28130
4. Generator's Phone (704) 399-5694

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: OLDOVER CORP.
6. US EPA ID Number: VA.D.0.4.0.1.5.9.4.3.6

C. State Transporter's ID
D. Transporter's Phone: 804-798-7981

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: OLDOVER CORP., RT. 2 OLD ASQUAHIE RD., NORWOOD, N.C. 28128
10. US EPA ID Number: N.C.D.0.0.0.7.73.6.5.5

G. State Facility's ID
H. Facility's Phone: 704-474-5399

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number): HM UN 1203 WASTE FLAMMABLE GASOLINE NOS

12. Containers No. Type 13. Total Quantity 14. Unit Wt/Vol 15. Waste No.

Table with 5 columns: a, b, c, d. Row a: UN 1203 WASTE FLAMMABLE GASOLINE NOS, 0.01 T, 0.3000 G, DOB, FOD, DOB, FOD

Table with 5 columns: 12. Containers No. Type, 13. Total Quantity, 14. Unit Wt/Vol, 15. Waste No.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: 502, T18 LIGHTWEIGHT AGGREGATE, ROTARY KILN

15. Special Handling Instructions and Additional Information: 800-662-7956 Emer. Phone No. Emergency Res. #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 governmental regulations.

Printed/Typed Name: EDWARD E. BURRIS Signature: Edward E. Burrin Month Day Year: 11/24/91

17. Transporter 1 Acknowledgement of Receipt of Materials: Printed/Typed Name: FRANKLIN PONDAS Signature: Franklin Pondas Month Day Year: 01/24/91

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: John B Burgess Signature: John B Burgess Month Day Year: 11/26/91

GENERATOR

TRANSPORTER

FACILITY

ORIGINAL — RETURN TO GENERATOR

(F001-F005) Spent Solvent Wastes Treatment Standards

For each "F" solvent waste constituent present in this waste, it is listed below and the appropriate space is checked.

Waste Code: F003, F005

The following is Table CCWE, 286.41 Treatment Standards expressed as concentrations in waste extract.

Solvent Constituent	Wastewaters (mg/L)	Non-Wastewater (mg/L)
Acetone	0.06	0.50
n-Butyl Alcohol	5.0	5.0
Carbon Dioxide	1.06	4.81
Carbon Tetrachloride	0.05	0.06
Chlorobenzene	0.15	0.05
Cresols	2.02	0.75
Cresylic Acid	2.02	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.65	0.125
Ethyl Acetate	0.05	0.75
Ethyl Benzene	0.05	0.033
Ethyl Ether	0.05	0.75
Isobutanol	5.0	5.0
Methanol	0.25	0.75
Methylene Chloride	0.20	0.05
Methyl Ethyl Ketone	0.05	0.75
Methyl isobutyl Ketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.075	0.05
✓ Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,1,2-Trichloro-1,2,2-Trifluoroethane	1.05	0.05
Trichloroethylene	0.062	0.001
Trichlorofluoromethane	0.05	0.05
✓ Xylene	0.05	0.15

The following is Table CCW, 286.43 Treatment Standards expressed as waste concentrations (not an extract).

1,1,2-Trichloroethane	0.03	7.5
Benzene	0.07	3.7
Methylene Chloride (Pharmaceutical)	0.44	N/A

California List Treatment Standards (Check the appropriate Box)

- Liquid hazardous wastes, including free liquid associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 mg/l. Cyanide reduction, or Solidification
- Liquid hazardous wastes, including free liquids associated with any solid or sludge containing the following metals (or elements) or compounds of these metals (or elements) at concentrations greater than or equal to those specified below: Removal of compounds and/or solidification to pass PFT
 - Arsenic and/or compounds (as As) 500 mg/l;
 - Cadmium and/or compounds (as Cd) 100 mg/l;
 - Chromium VI and/or compounds (as CR VI) 500 mg/l;
 - Lead and/or compounds (as Pb) 500 mg/l;
 - Mercury and/or compounds (as Hg) 20 mg/l;
 - Nickel and/or compounds (as Ni) 134 mg/l;
 - Selenium and/or compounds (as Se) 100 mg/l;
 - Thallium and/or compounds (as Tl) 130 mg/l.
- Liquid Hazardous Waste having a pH less than or equal to two (2.0). Adjust pH or solidification
- Liquid Hazardous Waste containing polychlorinated biphenyls (PCB's) at concentrations greater than or equal to 50 ppm. Incineration
- Hazardous wastes liquid or solid containing halogenated organic compounds (HOC's) listed in Appendix III to 40 CFR 268 (List of Halogenated Organic Compounds Regulated under 268.32) in total concentration greater than or equal to 1,000 mg/kg., excepting, wastes already subject to a treatment standard for specific HOC, for example, the spent solvents above. Incineration

CLEAN HARBORS OF BALTIMORE, INC.

No 18938

1910 Russell Street
Baltimore, MD 21230
(301) 685-3910

NON-HAZARDOUS WASTE MANIFEST

Manifest # _____ CCB# 512335 Date 7-19-91
 Generator: EXXON CO. U.S.A. #151 Phone No.: (704) 399-5696
TRUCK
6801 FREEDOM DRIVE EPA ID No.: NCD056478506
PAW CREEK, NC 28130 Contact: Gene Burris

Process which generated waste:

I certify that the materials described below are properly described, classified, packaged, marked & labeled, and are in proper condition to be transported in commerce under the applicable regulations of the State, the Environmental Protection Agency and the Department of Transportation. I certify that the waste described below is non-hazardous. I certify that the specified waste was delivered to the carrier named below for legal treatment, storage, or disposal at the site indicated.

Date 7-19-91 Signature Edward E Burris

Description of waste	Circle Form Solid Liquid Gas Sludge	Quantity	Circle Units Gallons Cu. Yds. Pounds Tons	Container	
				No.	Type
Waste Oil, Non-DOT Regulated		<u>2090</u>		<u>38</u>	<u>55 DM</u>

Transporter: Clean Harbors of Kingston, Inc. Phone No.: (617) 585-5112
100 Joseph Street EPA ID No.: MAD039322250
Kingston, MA 02364 Contact: Wayne Occhipinti
 Vehicle License Tag Number(s) 29603 (MASS) Unit Number(s) 622/131

I certify that the specified waste was transferred in a registered (licensed) vehicle to the disposal treatment, storage, or disposal facility named below and was accepted.

Pick-up Driver's Signature [Signature] Date 7-19-91 Delivering Driver's Signature _____ Date _____

TSD Facility: Clean Harbors of Baltimore, Inc. Phone No.: (301) 685-3910
1910 Russell Street EPA ID No.: MDD980555189
Baltimore, MD 21230 Contact: David Proud

Handling Method: landfill

I certify that the transporter above delivered the specified material to this TSD facility and was accepted and properly handled in the above manner. We are authorized and qualified by the State of _____ to handle this material.

Date 7-30-91 Signature: [Signature]

A. GENERAL INFORMATION

GENERATOR EXXON CO. U.S.A. BILL TO: EXXON CO. USA

FACILITY ADDRESS 681 FIRELINE DR PO BOX 80 BILL TO ADDRESS CHARLOTTE NC

PAW CREEK NC 28132

SIC NUMBER IF KNOWN _____ CLEAN HARBORS CONTACT PERSON TRIS MAURE

GENERATOR U.S. EPA ID # NC0056478506 SAMPLE APPROVAL P.O. # _____

GENERATOR STATE ID # _____ CUSTOMER CONTACT _____

TECHNICAL CONTACT _____ CUSTOMER CONTACT PHONE _____

TECHNICAL CONTACTS PHONE _____

B. WASTE DESCRIPTION

COMMON NAME FOR THE WASTE TURBO + HEATING OIL TANK CLEANING

PROCESS GENERATING THE WASTE TANK CLEANING

C. PROPERTIES

PH ~5 % ORGANIC NITROGEN _____ % SULFUR _____ % ORGANIC HALOGEN _____ BTU'S/POUND _____ % ASH _____

COLOR Brown ODOR _____ % T.O.C. _____

FLASH POINT (°F)

< 100 100-140 140-200 > 200 NO FLASH

PHYSICAL STATE

THICK VISCOUS LIQUID SOLID WITHOUT FREE LIQUIDS WASTE WATER

LIQUID WITH NO SOLIDS POWDER NON-WASTE WATER

LIQUID/SOLID MIXTURE

% DISSOLVED SOLIDS _____ % SUSPENDED SOLIDS ~ % SETTLED SOLIDS ~

D. COMPOSITION

<u>TURBO (300 Fuel)</u>	_____ %
<u>HEATING OIL</u>	_____ %
<u>DIESEL OIL</u>	_____ %
<u>WATER</u>	_____ %

E. METALS	TOTAL (PPM)	TCLP (PPM)	
ARSENIC	<u>N/A</u>		NICKEL <u>N/A</u>
BARIIUM			SELENIUM
CADMIUM			SILVER
CHROMIUM			THALLIUM
CHROMIUM Cr + 6			TIN
COPPER			ZINC
LEAD			OTHER
IRON			BERYLLIUM
MERCURY			OTHER

G. DEPARTMENT OF TRANSPORTATION INFORMATION

D.O.T. HAZARDOUS MATERIAL YES NO To be Determined

D.O.T. SHIPPING NAME _____

D.O.T. HAZARD CLASS _____

UN/NA # _____ REPORTABLE QUANTITY VALUE _____

F. OTHER COMPONENTS	
AMMONIA	<u>N/A</u>
BENZENE	<u>to be determined</u>
CHLORDANE	<u>N/A</u>
CHLORO BENZENE	
CHLOROFORM	
o-CRESOL	
m-CRESOL	
p-CRESOL	
CRESOL	
CYANIDES	
2,4-DICHLORO-	
PHENOXYACETIC ACID	
1,4-DICHLORO BENZENE	
1,1-DICHLOROETHYLENE	
2,4-DINITROTOLUENE	
ENDRIN	
F001-F005 SOLVENTS	
LIST	
HEPTACHLOR (AND ITS HYDROXIDES)	<u>N/A</u>
HEXACHLORO BENZENE	
HEXACHLOROETHANE	
LINDANE	
METHOXYCHLOR	
METHYL ETHYL KETONE	
NITROBENZENE	
PENTACHLOROPHENOL	
PCB'S	
PYRIDINE	
SULFIDES	
TETRACHLOROETHYLENE	
TOXAPHENE	
TRICHLOROETHYLENE	
2,4,5-TRICHLOROPHENOL	
2,4,6-TRICHLOROPHENOL	
2,4,5-TRICHLOROPHENOXYPROPIONIC ACID	
VINYL CHLORIDE	

H. SHIPMENT METHOD

BULK LIQUID BULK SOLID DRUM (SIZE) 55 gallon

OTHER (SPECIFY) _____

I. ANTICIPATED VOLUME

~40 GALS. DRUMS CUBIC YDS.

FREQUENCY: ONE TIME QUARTER YEAR

J. WASTE DISPOSAL STATUS

U.S. EPA HAZARDOUS WASTE YES NO To be Determined

U.S. EPA HAZARDOUS WASTE NUMBER(S) _____

STATE HAZARDOUS WASTE YES NO

STATE HAZARDOUS WASTE NUMBER(S) _____

K. OTHER HAZARDS

	YES	NO
PYROPHORIC	<input type="checkbox"/>	<input checked="" type="checkbox"/>
WATER REACTIVE	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EXPLOSIVE	<input type="checkbox"/>	<input checked="" type="checkbox"/>
RADIOACTIVE	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SHOCK SENSITIVE	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PESTICIDE	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DIOXIN	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IS THIS AN ELECTROPLATING WASTE	<input type="checkbox"/>	<input checked="" type="checkbox"/>

L. SAMPLE STATUS

A REPRESENTATIVE SAMPLE HAS HAS NOT BEEN SUPPLIED

FOR CLEAN HARBORS USE ONLY

This profile should fit under EXXON

Generic Profile 312336

M. SPECIFIC GENERATOR REQUEST FOR DISPOSAL

OTHER GENERATOR COMMENTS _____

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste.

[Signature]
AUTHORIZED SIGNATURE

[Print Name]
NAME (PRINT)

7-9-91
DATE

*Billed
7-29-91*

LAB OFF SPEC REPORT SHEET

DATE : 8/22/91
Gen : EXXON CO. USA.

WORK ORDER NO. 33399 -
PROFILE NO. _____

DRUM NO.	ORG. CHB CODE	FINAL CHB CODE	REASON FOR OFFSPEC
<u>717608</u>	<u>A32</u>	<u>A40</u>	<u>Tx 7 10 K</u>
<u>717613</u>	<u>A32</u>	<u>A40</u>	<u>Tx 7 40 K</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Options:

MUST REJECT THE DRUMS back to the generator
OR HAVE THE GENERATOR RE-MANIFEST THE DRUMS
TO BRAIN TREE

CUSTOMER SERVICE

CUSTOMER CONTACT: _____ DATE: _____ TIME: _____

RESULT: _____

AGREED UPON CHARGES: _____

RUMS | A31 | ~~A32~~ | A21 | A22 | A40 | B34 | SO | SSD | CHECK ONE

17043994100 P.04

IE / TECH INITIAL

8/21/91 / EAO

AMPLE NO

717608

GENERATOR

Resample

TO

0 OF DRUMS

X1

FROM

PREPARATION

BROWN OIL

CR NO (IF GIVEN)

N/A

<u>FLASH POINT</u>	<u>≥ 140°F</u>
<u>H₂O SOLUBILITY</u>	<u>NO</u>
<u>pH</u>	<u>N/A</u>
<u>T_x ≥ 100 ppm Tox</u>	<u>TEX</u>
<u>PCB</u>	<u>N/R</u>
<u>VOL (IF RECOVERED)</u>	<u>N/R</u>

Handwritten notes:
 A large handwritten 'X' is drawn over the bottom right section of the form.
 The text 'HIGH' is written vertically next to the 'X'.

SEP-03-1991 11:30 FROM CLEAN HARBORS BALT.

FORM: LAB
 2: DULAS
 3: DLTS

EPA ID: NC D 056478506

Submitted by: _____ Date: _____

Entered by: _____ Date: _____

Facility Name: EXXON TERMINAL # 4116 City: PAWCREEK NC 28130

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: S Date: 09/03/92

Type: CEI

Control Number Data Entry Personnel

Person: 0611 Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators
GER
GGR
GLB
GLO
GMR
GOR
GPT
GRR
GSC

Transporters
TGR
TMR
TOR
TRR
TWD

TSD's
DCH
DCL
DCP
DFR
DGS
DGW
DIN
DLB
DLF
DLT
DMC
DMR
DOR
DOT
DPB
DPP
DSI
DTR
DTT
DWP

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:
(72) 1: NOV docket # 92-413
2: _____

VIOLATION DATA: New: Change: Delete:

1 Agency: S Type: GMR Date (mdy) Determined: 09/03/92 Class:

Priority: Branch: 011 Person: 0611 Seq. Number (Data Entry)

Return to Compliance: 110/02/92 Scheduled 110/02/92 Actual

Reg. Type: SR Reg. Description (30): 262.20(a) failure to assign unique

Comment (72): 5 digit # to manifest. (Shipment made 1-28-92)

_____ Agency: Type: Date (mdy) Determined: Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -

8) Waste Minimization

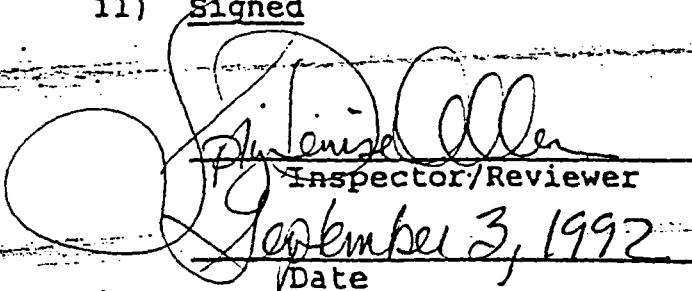
Terminal Technologies recovery.
Maintenance no longer uses lead based paints.

9) Site Deficiencies

262.20(a) Facility failed to assign a unique
5 digit number to a manifest. for a shipment
made 1-28-92

10) Recommendations

11) Signed


Inspector/Reviewer
September 3, 1992
Date


Facility Contact

RCRA INSPECTION REPORT

1) Facility Information

Exxon Terminal #4116
 Hwy 27 (PO Box 82) (6801 Freedom Drive)
Law Creek, NC 28130
NCD 056478 506

2) Facility Contact

Robert Duncan

3) Survey Participants

Robert Duncan

Phil Allen

4) Date of Inspection

September 3, 1992

6) Purpose of Survey

Records review and facility inspection to determine compliance with 40CFR 262, 265, and 268 Generator standards.

7) Facility Description

Exxon Terminal #4116 is a marketing terminal for refined petroleum products.

Ignidous waste stream generated are D001/F003/F005 paint related material from maintenance. D008, Solids from sand blast maintenance operations.

PSD facilities are ENSCO Inc ARD 069748192
(transported by Division Transport ARD 069748192)
and 65X Fuel Law SCD ~~987571672~~ ~~987571672~~ (Transported by
Fuel Law SCD 987571672 1070 375 985)

Tank cleanout sludge bottoms formerly manifested off site as D001/D018 are now treated on site by Terminal Technologies and recovered product is reused. Now RCRA sludge was sent to Great Cement for use in cement. Water/gasoline mixture from the tanks is a rich mixture and is sent to the Baton Rouge Refinery for recovery.

DH324



Received 7-3-92 57

1

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

Form Approved. OMB No. 2050-0039. Expires 9-30-92

AR 1-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NC071051G478150G		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.								
3. Generator's Name and Mailing Address EXXON Co., U.S.A. P.O. Box 82 PAW CREEK, NC 28130						A. State Manifest Document Number AR- 503957										
4. Generator's Phone (704) 529-4232						B. State Generator's ID										
5. Transporter 1 Company Name DIVISION TRANSPORT			6. US EPA ID Number AIRD10G91714811912			C. State Transporter's ID PC 708 H JQ		D. Transporter's Phone 501-863-7173								
7. Transporter 2 Company Name			8. US EPA ID Number			E. State Transporter's ID PC --- H ---		F. Transporter's Phone								
9. Designated Facility Name and Site Address ENSCO, INC. AMERICAN RD. EL DORADO, AR 71730						10. US EPA ID Number AIRD10G91714811912		G. State Facility's ID								
						H. Facility's Phone 501-863-7173										
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 WASTE PAINT RELATED MATERIAL FLAMMABLE LIQUID UN1263 ERG # 26						0102 DM		11000 P		D001 F003 F005						
b.																
c.																
d.																
J. Additional Descriptions for Materials Listed Above 11a: WMDS 154969						K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: GLENN S. GORMAN 302-695-5510										
if no alternate TSDf, return to generator																
15. Special Handling Instructions and Additional Information INVOICE DU PONT Co. MAILING: c/o GLENN GORMAN ADDRESS: 228 DERRY COURT WILMINGTON NC 28405						LAND DISPOSAL RESTRICTION NOTIFICATION FORM ATTACHED			ORDER # 83350 LOAD # 68516							
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 Arkansas state 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 x Robert B. DUNCAN					Signature <i>Robert B. Duncan</i>			Month Day Year 10/12/92								
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name x Jim Greenwalt					Signature <i>Jim Greenwalt</i>			Month Day Year 10/12/92								
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 Kerese Smith										Signature <i>Kerese Smith</i>			Month Day Year 01/28/92			

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

Solid Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

TO: EXXON TERMINAL #4116

Docket # 92-413

Address: HWY 27 (PO Box 82)
PAW CREEK, NC 28130

Inspection Date 9-3-92

EPA ID# NLD 056478506

Facility Type Generator

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On 9-3-92, Ms. Spring Allen representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Specifics

262.20(a) Failed to assign a unique 5 digit number to
a manifest (shipment made 1-28-92)

You are hereby required to correct the noted violation(s) by October 2, 1992, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A - 22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

September 3, 1992
(Date)

Spring Allen
N.C. Hazardous Waste Section

I, Spring Allen, hereby certify that I have personally served a copy of this Notice on:

Mr. Robert Duncan, at Exxon Terminal #4113, Paw Creek, NC
(Name) (Location)

on September 3, 1992.

Robert Duncan
(Recipient Signature)

copies to: field files
central files
Regional Office

92-413

RCRA INSPECTION FIELD NOTES

C = copies made; * = violation; P = photos

Facility name: Exxon Terminal #4116
Address: Hwy 37 (Pan Creek) (PO Box 82 - 28130)
ID number: NCO.D 0526 478 506
Date: 9-3-92 Last inspection: 9-3-91
Type of inspection: CEI
Contact: Robert Duncan
Present at Inspection: Robert Duncan

Waste Generated: 1) Pool / F003 / F005 - Paint Related (Maintenance)
2) Pool - Solid

Transporters: Division Transport TSD's: 1) ENSCO, INC ARD 069 748 192
2) ARD 069 748 192

Manifests: No document # 1-28-92 (22001) 3 25-92
262,20 (2) Pool / F003 / F005 . Pool OK

Signed copies: OK
Treatment Standards: OK

Inspection Records: done weekly - OK

Contingency Plan: Sent 10/11/91 - -

actions for spill/fire: OK
agreements with emergency management: OK. MSDS's in plan
name, address, phone for em coords: OK
emergency equip/location/alarms: OK
evacuation plan/signals/primary/secondary: OK
em coords updated? Rob Duncan / Mason Barnett.
reports on use of conting plan? OK

Training Records: OK

Last training: 4/22/92
Job Title: Em Coords Required only
Job description: Em Coords Required only
Content: OK
Sign-off: OK
em coords and appropriate personnel trained? OK

Annual Report: OK
Waste Analysis: OK
Accumulation areas: Glycol/gas mixture Tanks all closed labeled dated

Storage Area: OK

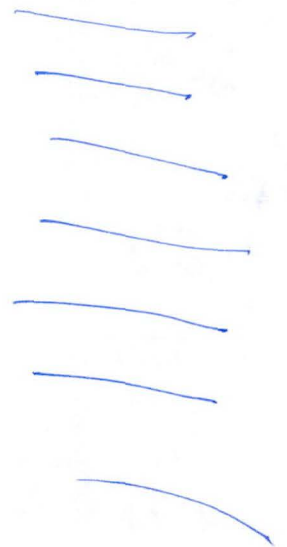
Notes: water/mix is pumped off & sent to the Baton Rouge Refinery for recycling.




D001

D008

D17-4



analysis of residue after ~~Treatment~~^{SA}

Terminal
Technologies
Process

EXXON #4116

EVERGREEN ANALYTICAL, INC.
4036 Youngfield St. Wheat Ridge, CO 80033
(303) 425-6021


Received
9-3-92 SA

Extractable Organic Halogens (EOX)

Date Sampled : 03/05/92	Client Project No.: 5365-EXXON
Date Received : 03/06/92	Charlotte, NC
Date Prepared : 03/13/92	Lab Project No. : 92-0739
Date Analyzed : 03/13/92	Method : SW846 Method 9020 (Modified)

<u>Evergreen</u> <u>Sample #</u>	<u>Client</u> <u>Sample #</u>	<u>Matrix</u>	<u>EOX *</u> <u>mg/Kg</u>
X50364	5365	SOIL	48

* Results corrected for standard and blank recoveries.



Approved



Quality Assurance Officer

EVERGREEN ANALYTICAL, INC
4036 Youngfield St. Wheat Ridge, CO 80033
(303) 425-6021

TOTAL RECOVERABLE PETROLEUM HYDROCARBONS

Date Sampled : 3-5-92	Client Project : 5365-Exxon-Charlotte, NC
Date Received : 3-6-92	Lab Project No.: 92-0739
Date Prepared : 3-17-92	Method : EPA 418.1
Date Analyzed : 3-17-92	

<u>Evergreen</u> <u>Sample No.</u>	<u>Client</u> <u>Sample No.</u>	<u>Matrix</u>	<u>TRPH*</u>
X50364A	5365	Soil	119000. mg/Kg(11.9%)

Post-It™ brand fax transmittal memo 7671 # of pages 6

To <i>Jim Wagoner</i>	From <i>Carl Smith</i>
Co <i>Terrill Tech</i>	Co.
Dept. <i>3/23 1430</i>	Phone #
Fax # <i>1-219-942-8922</i>	Fax #

*Reported values based on specific gravity of 1.0; Detection limit 3.33 mg/Kg for soils. Blank value subtracted.

M. Mosh
Approved

Carl Smith
Quality Assurance Officer

EVERGREEN ANALYTICAL, INC.
4036 Youngfield St. Wheat Ridge, CO 80033
(303)425-6021

TCLP Benzene Data Report

Client Sample #	: 5365	Client Project #	: 5365-EXXON
Lab Sample #	: X50364		Charlotte, NC
Date Sampled	: 03/05/92	Lab Project #	: 92-0739
Date Received	: 03/06/92	Dilution Factor	: 10.000
Date Extracted/Prepared	: 03/18/92	Method	: 8020
Date Analyzed	: 03/20/92	Matrix	: TCLP Extract
Percent Loss on Drying	: NA	Lab File No.	: PID5831
Methanol extract?	: No	Method Blank No.	: MB032092

Compound Name	Cas Number	Concentration ug/L		PQL* ug/L
Benzene	71-43-2	4	J	40

** This is Evergreen's estimated PQL value for a single xylene peak.

Surrogate Recoveries;
a,a,a-Trifluorotoluene 72%

QUALIFIERS:

- U = Compound analyzed for, but not detected.
- J = Indicates an estimated value when the compound is detected, but is below the CLP Practical Quantitation Limit (PQL).
- B = Compound found in blank and sample. Compare blank and sample data
- * = The Practical Quantitation Limit is equal to the dilution factor multiplied by ten times the Method Detection Limit as determined by EPA SW846, Vol. 1B, Part II, pa. 8000-14.
- NA = Not applicable or not available.

Approved: D. Gladson

[Signature]
Quality Assurance Officer

EXXON COMPANY, U.S.A.

POST OFFICE BOX 82 • PAW CREEK, NORTH CAROLINA 28130

MARKETING DEPARTMENT

Sept. 3, 1992

Renese Smith
Ensco, Inc.
American Rd.
Eldorado, Arkansas 71730

Dear Renese:

Reference the enclosed copy of a hazardous waste manifest for waste generated at the Exxon Co. USA Charlotte terminal (State document #503957). The EPA has brought it to my attention that this manifest was inadvertently used without a 5 digit manifest document number. This letter is to notify you that I as signature under the generator's name am assigning the number 92001 to this manifest (I have enclosed a copy with this number written in also). Please be absolutely certain that your records reflect this identification change. Please send me a return letter noting that you have completed this process. If you have any questions or require more information please feel free to call me at 704-399-5696.

Yours Truly,



Robert B. Duncan Jr.
Terminal Superintendent
Original Signature under
Generator Certification

.cc Spring Allen - NCDEHNR Asheville
Jesse Wells - Mooresville, N.C.





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

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NC07105G478506		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address EXXON Co., U.S.A. P.O. Box 82 PAW CREEK, NC 28130				4. Generator's Phone (704) 529-4232		A. State Manifest Document Number AR-503957							
5. Transporter 1 Company Name DIVISION TRANSPORT				6. US EPA ID Number IARDI069174811912		C. State Transporter's ID PC 1708 H JQ		D. Transporter's Phone 501-863-7173					
7. Transporter 2 Company Name				8. US EPA ID Number		E. State Transporter's ID PC --- H ---		F. Transporter's Phone					
9. Designated Facility Name and Site Address ENSCO, INC. AMERICAN RD. EL DORADO, AR 71730				10. US EPA ID Number IARDI069174811912		G. State Facility's ID							
						H. Facility's Phone 501-863-7173							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. RQ WASTE PAINT RELATED MATERIAL FLAMMABLE LIQUID UN1263 ERG # 26						0102 DM		11000 P		P		D001 F003 F005	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above 11a: WMDS 154969						K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: GLENN S. GORMAN 302-695-5510							
If no alternate TSDF, return to generator													
15. Special Handling Instructions and Additional Information INVOICE MAILING ADDRESS: DUPONT Co. c/o GLENN GORMAN 228 DERRY COURT WILMINGTON, NC 28405						LAND DISPOSAL RESTRICTION NOTIFICATION FORM ATTACHED							
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 Arkansas state 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.						ORDER # 83350 LOAD # 68516							
Printed/Typed Name * Robert B. DUNCAN				Signature <i>Robert B. Duncan</i>		Month Day Year 10/12/92							
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name * Jim Greenwalt				Signature <i>Jim Greenwalt</i>		Month Day Year 10/12/92							
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 Renese Smith				Signature <i>Renese Smith</i>		Month Day Year 01/28/92							

Corrected copy follows



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

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NC010564785009126101		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address EXXON CO., U.S.A. P.O. Box 82 PAW CREEK, NC 28130				A. State Manifest Document Number AR 503957				B. State Generator's ID	
4. Generator's Phone 704-1529-4232				6. US EPA ID Number IAIRDIOG91714811912				C. State Transporter's ID PC 708 H JR	
5. Transporter 1 Company Name DIVISION TRANSPORT				7. Transporter 2 Company Name				D. Transporter's Phone 501-863-7173	
9. Designated Facility Name and Site Address ENSCO, INC. AMERICAN RD. EL DORADO, AR 71730				10. US EPA ID Number IAIRDIOG91714811912				E. State Transporter's ID PC --- H ---	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. 'RQ WASTE PAINT RELATED MATERIAL FLAMMABLE LIQUID UN1263 ERG # 26				No. Type 0102 DM		11000 P		L Waste No. D001 F003 F005	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above 11a: WMDS 154969				K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: GLENN S. GORMAN 302-695-5510					
If no alternate TSDf, return to generator									
15. Special Handling Instructions and Additional Information INVOICE DU PONT Co. MAILING : C/O GLENN GORMAN ADDRESS : 228 DERRY COURT WILMINGTON, NC 28405				LAND DISPOSAL RESTRICTION NOTIFICATION FORM ATTACHED		ORDER # 83350 LOAD # 68516			
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 Arkansas state 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				Signature Robert B. Duncan		Month Day Year 10/12/92			
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature Jim Greenwalt		Month Day Year 10/12/92			
18. Transporter 2 Acknowledgement of Receipt of Materials				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 Kensee Smith				Signature Kensee Smith		Month Day Year 10/28/92			

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

EPA ID: NC00056478506

Submitte _____ Entered by: _____ Date: _____

Facility Name: Exxon Terminal City: Law Creek

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: S Date: 10/20/92 Type: CSA Control Number Data Entry Personnel

Person: 027 Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators

GER	
GGR	
GLB	
GSQ	
GMR	<input checked="" type="checkbox"/>
GOR	
GPT	
GRR	
GSC	

Transporters

TGR	
TMR	
TOR	
TRR	
TWD	

TSD's

DCH		DLB		DPB	
DCL		DLF		DPP	
DCL		DLT		DSI	
DFR		DMC		DTR	
DGS		DMR		DTT	
DGW		DOR		DWP	
DIN		DOT			

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:

(72) 1: Facility is in compliance with docket number 92-413
2:

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -

RCRA INSPECTION REPORT

1) Facility Information:

Exxon Terminal
Hwy 27.
Law Creek, N.C. 28130
NCD056478506

2) Facility Contact:

Mr. Robert Duncan

3) Survey Participants:

Mr. Phillip Dely

4) Date(s) of Inspection:

October 20, 1992

5) Purpose of the Survey:

To determine compliance with Notice of Violation
Docket number 92-413.

6) Facility Description:

No change from inspection on September 3, 1992.

7) Waste Minimisation

No change

8) Site Deficiencies:

1) 262. 20(a) - Facility is in compliance with Nov.

9) Recommendations:

10) Signatures:

Prilly Day
Inspector(s)/Reviewer

10/20/92
Date(s)

Robert A.
Facility Contact

10/20/92

Solid Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

TO: EXXON TERMINAL #4116

Docket # 92-413

Address: HWY 27 (PO Box 82)
PAW CREEK, NC 28130

Inspection Date 9-3-92

EPA ID# NLD 056478506

Facility Type Generator

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On 9-3-92, Ms. Spring Allen representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Specifics

262.20(a) Failure to assign a unique 5 digit number to
a manifest (shipment made 1-28-92)

You are hereby required to correct the noted violation(s) by October 2, 1992, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A - 22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

September 3, 1992
(Date)

Spring Allen
N.C. Hazardous Waste Section

I, Spring Allen, hereby certify that I have personally served a copy of this Notice on:

Mr. Robert Duncan, at Exxon Terminal #4113, Paw Creek, NC
(Name) (Location)

on September 3, 1992.

Robert Duncan
(Recipient Signature)

copies to: field files
central files To DO
Regional Office

EPA ID: NC D 0 5 6 4 7 8 5 0 6

Submitted by: _____ Date: _____
Entered by: _____ Date: _____

Facility Name: Exxon Terminal # 4116 City: PawCreek

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: Date: Mo. 01 / Day 14 / Year 92 Type: CSE
Control Number Data Entry Personnel

Person: 025 Reason: 01

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators
GER E
GGR E
GLB E
GLO E
GMR E
GOR E
GPT E
GRR E
GSC E

Transporters
TGR
TMR
TOR
TRR
TWD

TSD's
DCH
DCL
DCP
DFR
DGS
DGW
DIN
DLB
DLF
DLT
DMC
DMR
DOR
DOT
DPB
DPP
DSI
DTR
DTT
DWP

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:
(72) 1: Facility was determined to be in compliance with Notice
2: of Violation Docket # 91-395

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (mdy) Determined: / / Class:
Priority: Branch: Person: Seq. Number (Data Entry)
Return to Compliance: / / Scheduled Actual /
Reg. Type: Reg. Description (30): _____
Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
Priority: Branch: Person: Seq. Number (Data Entry)
Return to Compliance: / / Scheduled Actual /
Reg. Type: Reg. Description (30): _____
Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
Priority: Branch: Person: Seq. Number (Data Entry)
Return to Compliance: / / Scheduled Actual /
Reg. Type: Reg. Description (30): _____
Comment (72): _____

Continue violation data on Side B if necessary -

RCRA INSPECTION REPORT

1) Facility Information

Exxon Terminal # 4116
Highway 27
Paw Creek, N.C.
NCD 056 478 506

2) Facility Contact

Mr. Robert B. Duncan, Jr. Terminal Superintendent

3) Survey Participants

Mr. Jesse Wells, H.W.S.
Mr. Robert B. Duncan, Jr.

4) Date(s) of Inspection

1/14/92

5) Purpose of the Survey

To determine compliance with Notice of Violation
Docket # 91-395

6) Facility Description

No terminal operation changes since last
inspection of 9/3/91

7) Waste Minimization

8) Site Deficiencies

265.54(c) - The contingency Plan has been updated to reflect construction changes.

265.52(f) The contingency plan describes the primary and alternate evacuation routes

Amended copies of the plan have been submitted to appropriate agencies as per 40 CFR 265.53(b)

The facility was determined to be in compliance with Docket # 91-395

9) Recommendations

1) Mr. Duncan will replace Mr. Gene Burris as emergency coordinator effective February 1, 1991. Contingency plan must be amended and sent to appropriate agencies to reflect changes.

2) Annual training must be conducted for employees handling hazardous waste

10) Signed during January, 1992.

Gene W. Tellez
Inspectors/Reviewer
1/14/92
Date(s)

[Signature]
Facility Contact



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

November 1, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION
DOCKET 91-395

Mr. Edward E. Burris
Exxon Terminal #4116
Paw Creek, NC 28214

NCD 056 478 506

Dear Mr. Burris:

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (Act), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A, (Rules) in lieu of the federal RCRA program. Exxon Terminal #4116, Paw Creek, North Carolina is classified as a generator of hazardous waste and is subject to the requirements of 40 CFR 262 codified at 15A NCAC 13A .0007.

In addition, Exxon Terminal #4116 is subject to the current prohibitions on land disposal of hazardous waste, effective November 8, 1986, that applies to spent solvent wastes F001/F005; effective July 8, 1987, for the "California List Wastes"; effective August 8, 1988, for the "First Third" listed wastes; effective June 8, 1989, for the "Second Third" listed wastes; and effective May 8, 1990, for the "Third Third" listed wastes.

On September 3, 1991, Ms. Spring Allen, Waste Management Specialist with this office, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

- A. - 40 CFR 262.20(a), codified at 15A NCAC 13A .0007, states that a generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a Manifest OMB control number 2050-0039 on EPA form 8700-22 and, if necessary, EPA form 8700-22A, according to the instructions included in the Appendix to Part 262.

Exxon Terminal #4116 is in violation of 40 CFR 262.20(a), codified at 15A NCAC 13A .0007, in that Exxon Terminal #4116 offered for transportation, hazardous waste for off-site treatment, storage, or disposal and did not prepare a Manifest OMB control number 2050-0039 on EPA form 8700-22, according to the instructions included in the Appendix to Part 262. Specifically, waste was misidentified with inappropriate codes denoting F listed solvents.

- B. 40 CFR 262.34(a)(5), 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 generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265, and with Section 265.16.
- 1. 40 CFR 265.52(f), codified at 15A NCAC 13A .0010, states that the contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Exxon Terminal #4116 is in violation of 40 CFR 262.34(a)(5), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.52(f), codified at 15A NCAC 13A .0010, in that the contingency plan did not include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary.

- 2. 40 CFR 265.54(c), codified at 15A NCAC 13A .0010, states that the contingency plan must be reviewed, and immediately amended, if necessary, whenever 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.

Exxon Terminal #4116 is in violation of 40 CFR 262.34(a)(5), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.54(c), codified at 15A NCAC 13A .0010, in that it failed to amend the contingency plan to reflect construction and design changes which changes the response necessary in an emergency.

- C. 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 the 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.

Exxon Terminal #4116 is in violation of 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0012, in that it failed to retain on-site a copy of the notification of Land Disposal Restriction, specifically, for manifest number 12189. This violation was corrected during the inspection by a Facsimile copy of the original notification, being sent from the treatment, storage, or disposal facility.

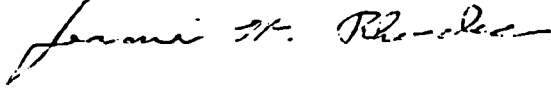
COMPLIANCE SCHEDULE

By December 5, 1991, you shall comply with the following requirements:

- A. Comply with 40 CFR 262.20(a), codified at 15A NCAC 13A .0007, by ensuring that all hazardous waste is properly manifested prior to transportation to an approved treatment, storage or disposal facility.
- B. Comply with 40 CFR 262.34(a)(5), codified at 15A NCAC 13A .0007, specifically:
 1. By amending the contingency plan to include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. The evacuation plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires) as required in 40 CFR 265.52(f), codified at 15A NCAC 13A .0010.
 2. By amending the contingency plan to reflect the changes in design and construction which took place in 1990, as required in 40 CFR 265.54(c), codified at 15A NCAC .0010.
- C. Comply with 40 CFR 268.7(a)(7), codified at 15A NCAC 13A .0012, by retaining on-site copies 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 the 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.

If the requirements above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

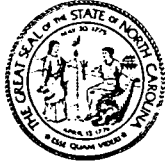
Sincerely,

A handwritten signature in cursive script, appearing to read "Jerome H. Rhodes".

Jerome H. Rhodes, Chief
Hazardous Waste Section

JHR/pcs/KM301

cc: Keith Masters
Spring Allen
Central Files
Al Hilton



North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

May 16, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION
Docket #89-202

Mr. Edward Burris
Exxon Terminal #4116
P.O. Box 82
Paw Creek, North Carolina 28130

NCD 056 478 506

Dear Mr. Burris:

On December 18, 1980 the State of North Carolina, Hazardous Waste Branch (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (Act), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 10 NCAC 10F, (Rules) in lieu of the federal RCRA program. Exxon Terminal #4116, Paw Creek, North Carolina is classified as a generator of hazardous waste and is subject to the requirements of 40 CFR 262 codified at 10 NCAC 10F .0030.

On April 28, 1989, Mr. Adam Wipfield, Waste Management Specialist with this office, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violation was noted:

40 CFR 263.40(e), codified at 10 NCAC 10F .0030, states that a generator must keep records and results of inspections as required by Section 262.34 for at least 3 years from the date of the inspection.

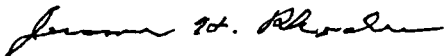
Exxon Terminal is in violation of 40 CFR 262.40(e), codified at 10 NCAC 10F .0030, in that records of inspections of hazardous waste containers were not kept. Waste generated as a result of cleaning out petroleum storage tanks and from scraping tanks prior to painting was stored on site. It is understood that inspections were made of this waste, but no records were kept.

Compliance Schedule

You shall ensure compliance with 40 CFR 262.40(e), codified at 10 NCAC 10F .0030 by maintaining records of inspections made during storage of hazardous waste containers on site.

If the requirement above is not met on a continuing basis, pursuant to N.C.G.S. 130A-22(a) and 10 NCAC 10G .0701 - .0707, an administrative penalty of up to \$10,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

Sincerely,



Jerome H. Rhodes, Head
Hazardous Waste Branch
Solid Waste Management Section

JHR/dd

cc: Adam Wipfield ✓
Doug Holyfield
Central Files

DH238



North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

April 26, 1989

Exxon Terminal #4116
PO Box 4415
Houston TX 77210

RE: EPA ID No.: NCD056478506

Dear Sir:

Based on information supplied by you for the site identified with the above EPA ID number, the state has accepted and processed the change RCRA listing or information that you requested.

Listed below is site information contained on our computer files:

COMPANY NAME	<u>Exxon Terminal #4116</u>
OWNERSHIP	<u>Exxon Corporation</u>
CONTACT	<u>Forrester, Keith</u>
PHONE NUMBER	<u>(704)399-5696</u>
LOCATION ADDRESS	<u>Hwy 27</u>
CITY, STATE & ZIP	<u>Paw Creek NC 28130</u>

Please verify that the above computer listing/information is correct by notifying us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status. Your EPA ID number has not been inactivated.

Sincerely,

A handwritten signature in cursive script that reads "R.J. Edwards".

R.J. Edwards, Compliance Officer
Hazardous Waste Management Branch

CC: ADAM WIPFIELD
EPA Region IV
Mecklenburg County Health Department

FACILITY INFORMATION:

DATE OF INSPECTION

Exxon Terminal # 4116

4-28-89

Hwy 27 at Moores Chapel Rd.

Paw Creek, N.C.

EPA ID NUMBER:

MECKLENBURG COUNTY

NCD 056478506

RESPONSIBLE OFFICIAL: Edward Butts, Terminal Manager

SURVEY PARTICIPANTS: Adam Wiffield, Ed Butts

DOCUMENTATION OF SITE DEFICIENCIES: 262.40(e) - Records of CONTAINER inspections have NOT BEEN MAINTAINED. See description below.

FACILITY DESCRIPTION:

Exxon Terminal is a petroleum fuel storage and distribution center located in Paw Creek, N.C., about 10 miles NW of Charlotte. Hazardous wastes generated result from periodic cleaning of the interior of product storage tanks and scraping the outsides of tanks in preparation for re-painting.

In September, 1988, two product storage tanks were cleaned out resulting in 49 drums of D001 waste generated. This waste was transported by Freehold Cartage, Inc. to ThermalKEM in Rock Hill, S.C. for disposal on 9/29/88.

During approximately December 1988, two tanks were scraped down prior to re-painting. The old paint collected was analysed and found to have Lead and Chromium above RCRA levels. This waste was drummed for shipment to Chemical Waste Management for disposal and was actually shipped on 2/28/89.

EXXON

4-28-89

GENE BURRIS

2 TANKS cleaned - D001 9-29-88

2 TANKS PAINTED - D008 Chemical waste management
Emelle, Ala.

D008 H/W solid 490m - SHIPPED 2/28/89

D001 - Freehold Cartage Inc, NID 054126640 TO ThermalKEM
Rock Hill

Annual report - 1988

INSPECTION log - No. log KEPT

Contingency plan - arrangements w/ local authorities OK
evacuation plan - OK

training OK SEPT '88.

CONTAINER/TANK INSPECTION FORM - PART 265

Exxon Terminal #4116

NCD 056478506

4-28-89

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

1. Condition Of Containers (265.171)

- leakage
 past leakage (evidence)
 severe rusting
 structural defect

2. Compatibility Of Waste With Containers (265.172)

- visual evidence of noncompliance
(leakage, corrosion)

3. Management of Containers (265.173)

- closed (a)
 improper handling or storage (b)

4. Inspections (265.174)

- weekly (minimum)

5. Special Requirements For Ignitable or Reactive Waste (265.176)

- 15m (50 ft)

6. Special Requirements For Incompatible Waste (265.177)

- mixing (a)
 unwashed container (b)
 separation (c)

SUBPART J - TANKS

1. General Operating Requirements (265.192)

- compatibility (a)(b)
 uncovered tank precautions (c)
 overflow prevention (d)

2. Waste Analysis and Trial Tests (265.193)*

- *Section not applicable to a generator only
 waste analysis/trial test

3. Inspections (265.194)

- discharge control equipment (a)(1)
 monitoring equipment (a)(2)
 waste level (a)(3)
 construction material (a)(4)
 surrounding area (a)(5)
 assessment schedule/procedures (b)

4. Closure (265.197)

- plan on-site

5. Special Requirements For Ignitable Or Reactive Waste (265.198)

- properly stored (a)(1)(2)(3)
 buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265.199)

- properly stored (a)
 tank washed (b)

REMARKS: No containers are in storage at the time of the inspectionHowever, no inspection log of the hazardous waste containerswas kept during the time containers were in storage.

FACILITY INFORMATION

DATE OF INSPECTION

EXXON TERMINAL # 4116

5-5-88

HWY 27

APPLICABLE REGULATIONS:

PAW CREEK, N.C.

40CFR 26.2

EPA ID NUMBER:

NCD 056478506

MECKLENBURG COUNTY

RESPONSIBLE OFFICIAL: Ed BURRIS, TERMINAL Manager

SURVEY PARTICIPANTS: ADAM WIPFIELD, Ed BURRIS

PURPOSE OF SURVEY: A RCRA inspection was conducted at this site in PAW CREEK, N.C. by the N.C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and records review. Regulatory requirements covered those contained in 40 CFR 26.2 Generator Standards.

DOCUMENTATION OF SITE DEFICIENCIES: NONE

COMPLIANCE SCHEDULE AND RECOMMENDATIONS:

N/A

FACILITY DESCRIPTION:

No change in facility description since the last inspection.

13. Annual Reporting (262.41)

C submitted (a)(1-6)

C submitted (b)

14. Exception Reporting (262.42)

C transporter contact (a)

C exception report (b)(1)(2)

REMARKS:

No HAZARDOUS waste generated since the time of the
last inspection.

CONTAINER/TANK INSPECTION FORM - PART 265

EXXON TERMINAL #4116

NCD 056478506

5-5-88

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

- 1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174)
 - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

- 1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: No hazardous waste containers on-site



North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
Phillip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

April 30, 1987

Exxon Terminal #4116
PO Box 82
Paw Creek, NC 28130

RE: EPA ID No. NCD056478506

Dear Sir:

Based on information supplied by you for the site identified with the above EPA ID number, the state has accepted and processed the change RCRA listing or information that you requested.

Listed below is site information contained on our computer files:

COMPANY NAME	<u>Exxon Terminal #4116</u>
OWNERSHIP	<u>Exxon Corporation</u>
CONTACT	<u>Burris Edward E.</u>
PHONE NUMBER	<u>(704)399-5696</u>
LOCATION ADDRESS	<u>Hwy 27</u>
CITY, STATE & ZIP	<u>Paw Creek NC 28130</u>

Please verify that the above computer listing/information is correct by notifying us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status. Your EPA ID number has not been inactivated.

Sincerely,

A handwritten signature in cursive script that reads "Margaret Babb".

Margaret Babb, Environmental Chemist
Solid & Hazardous Waste Management Branch

CC: ADAM WIPFIELD
EPA Region IV

FACILITY INFORMATION:

DATE OF INSPECTION

Exxon Terminal # 4116

Hwy 27 at Moores Chapel Rd.

Paw Creek, N.C.

MECKLENBURG COUNTY

EPA ID NUMBER:

NCD 056478506

RESPONSIBLE OFFICIAL: Edward Butts, Terminal Manager

SURVEY PARTICIPANTS: Adam Winfield,

DOCUMENTATION OF SITE DEFICIENCIES: _____

FACILITY DESCRIPTION:

Exxon Terminal is a petroleum fuel storage and distribution center located in Paw Creek, N.C., about 10 miles NW of Charlotte. Hazardous wastes generated result from periodic cleaning of the interior of product storage tanks and wrapping the outsides of tanks in preparation for repainting.

IMPORTANT

(MD)

To Spring

Date 9/16 Time 2:43

WHILE YOU WERE OUT

M Jack Roberts

of Exxon

Phone _____

AREA CODE NUMBER EXTENSION

TELEPHONED	PLEASE CALL	
CALLED TO SEE YOU	WILL CALL AGAIN	<input checked="" type="checkbox"/>
WANTS TO SEE YOU	URGENT	
RETURNED YOUR CALL		

Message would like to

meet with you at
Paw Creek tomorrow

9-17-855AM-TC

917-350

Spokew/ Jack Roberts

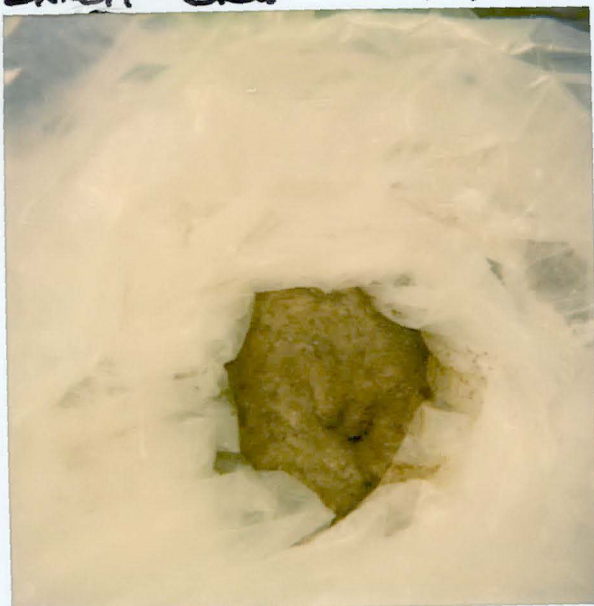
Signed

N.C. Dept. of Environment, Health, and Natural Resources



Printed on Recycled Paper

Exxon - Char 9-3-91



Closeup of solid residue from Terminal Technologies process. awaiting determination

Exxon Char 9-3-91



Bag of solid residue 1918 only one labeled "Non HW" ~~to~~ be determined contents

Exxon - Char 9-3-91



Area of clean out accumulation. Solid residues from Terminal Technology process awaiting analytical results see close up. of solid

Exxon Char 9-3-91



Label on tank truck 8/28/91 contents "To be determined"

EXXON TERMINAL # 4116
Hwy 27 at Moores Chapel R.
Paw Creek 28130

4/21/87

2

056478506

Mecklenburg

Edward E. BURRIS, Terminal Manager
Edward BURRIS

Paw Creek

2 Generator

NONE cited

N/A This site is in full compliance as a generator.

EXXON Terminal is a Petroleum fuel storage and distribution center located in Paw Creek, about 10 miles NW of CHARLOTTE. Hazardous waste generated results from sludges collected from the bottoms of product storage tanks during the periodic cleaning process. The last tank cleaning occurred in about 1983 or so when Caldwell Industrial Services removed sludge (U1203) from a gasoline storage tank.

GENERATOR INSPECTION FORM - PART 262

EXXON TERMINAL #4116 NCD 056478506 MECKLENBURG
 Name of Site EPA I.D. County
HWY 27 Paw Creek 4/21/87 Adam Wipfield
 Location Inspection Date Signature of Inspector(s)

_____ Edward E. Bernd
 Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
- 4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)
- 5. Number of Copies (262.22)
 - minimum number
- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
 - 8. Labeling (262.31)
 - D.O.T. compliance
 - 9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)
 - 10. Placarding (262.33)
 - D.O.T. compliance
 - 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)*
- *Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)

13. Annual Reporting (262.41)

submitted (a)(1-6)

submitted (b)

14. Exception Reporting (262.42)

transporter contact (a)

exception report (b)(1)(2)

REMARKS: No HAZARDOUS WASTE generated in the last several years
No violations.

CONTAINER/TANK INSPECTION FORM - PART 265

EXXON TERMINAL #4116

NCD 056478506

4/21/87

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

- 1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174)
 - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

SUBPART J - TANKS

- 1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: No hazardous waste containers on-site at time of inspection

**N. C. Department of Human Resources
Div. of Health Services
P. O. Box 2091 * Raleigh, North Carolina 27602-2091**

James G. Martin, Governor
Philip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

May 8, 1985

A.D. AUTEN
Exxon Terminal #4116
P.O. Box 82
Paw Creek NC 28130
EPA NUMBER: NCD056478506

Dear A.D. AUTEN:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 03/28/85 by Mr. ANDREW HENDERSON Solid and Hazardous Waste Management Branch. No violations were observed. The inspection did not include a review of the Financial or Ground Water monitoring requirements, if applicable. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,

**ORIGINAL SIGNED BY
WILLIAM PAIGE**

William Paige
Environmental Engineer
Solid and Hazardous Waste
Management Branch
Environmental Health Section

✓
copy: ANDREW HENDERSON

INSTRUCTIONS

Purpose

Form DHS 3218 is designed to serve as a summary of a field action. DHS 3218 is completed by a representative of the Solid and Hazardous Waste Management Branch and submitted to the Raleigh office for entry into the computer data base.

Copy Retention

A copy of DHS 3218 is retained by the inspector and becomes part of a companies permanent record.

Re-order

DHS 3218 can be ordered upon request to:

Solid and Hazardous Waste Management Branch
P.O. Box 2091
Raleigh, N.C 27602



DIVISION OF HEALTH SERVICES
 P.O. Box 2091
 Raleigh, N.C. 27602-2091

Full Compliance
 3-28-85
 Ronald H. Levine, M.D., M.P.H.
 STATE HEALTH DIRECTOR

Date: Feb 12 '85
 Inspector: Mark Henderson

Section I. General Information

COMPANY NAME: Exxon Terminal #4116
Charlotte (City)
 EPA ID No.: NE056478506
 INSPECTION/ACTION DATE: 2-11-85
 CONTACT: A.D. Auten
 (print)

Section II. RCRA Classification

Generator; () Transporter; () Interim Status-TSDF; () Final Status-TSDF

Section III. Inspection/Action Classification

Initial Annual (Gen, Trans.); () Initial Semi-annual (TSDF); () Re-inspection

Section IV. Action Codes

Compliance Inspection; () Sampling Inspection; () Compliance Order Inspection; () Non-notifier Inspection; () Overview Inspection; () Complaint Inspection; () Record Review; () Comprehensive Groundwater Evaluation; () Negotiation Meeting; () Informal Settlement Agreement; () State Order - (Consent, Administrative, etc.); () Hearing; () Penalty Assessed; () Penalty Collected; () Civil Action; () Criminal Action

Section V. Compliance Status

() In Compliance; In Violation; () All Previous Violation Existing; () Previous Violations Corrected - But New Ones Exist; () Previous Violation Existing Along With Additional Ones.

Section VI. Letter Action

NOV; () CO; () In Compliance; () Penalty; () None

Section VII. Compliance Date

3-28-85
 mo/day/yr

FOR RALEIGH OFFICE USE ONLY:
 I. () I II. Compliance Order Date
 () G
 () F
 () C
 mo/day/yr

DHS 3218 Rev. 10/84
 Solid & Hazardous Waste

INSTRUCTIONS

Purpose

Form DHS 3218 is designed to serve as a summary of a field action. DHS 3218 is completed by a representative of the Solid and Hazardous Waste Management Branch and submitted to the Raleigh office for entry into the computer data base.

Copy Retention

A copy of DHS 3218 is retained by the inspector and becomes part of a companies permanent record.

Re-order

DHS 3218 can be ordered upon request to:

Solid and Hazardous Waste Management Branch
P.O. Box 2091
Raleigh, N.C 27602

GENERATOR INSPECTION FORM - PART 262

Exxon Terminal #4116 NEID 056 475506 Mecklenburg
 Name of Site EPA I.D. County
 Hwy 27 at Moore Chapel Rd 2-11-85 Mark Henderson
 Location Inspection Date Signature of Inspector(s)
3-28-85 [Signature]
 Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
- 4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)
- 5. Number of Copies (262.22)
 - minimum number
- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
- 8. Labeling (262.31)
 - D.O.T. compliance
- 9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)
- 10. Placarding (262.33)
 - D.O.T. compliance
- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)

13. Annual Reporting (262.41)

- submitted (a)(1-6)
- submitted (b)

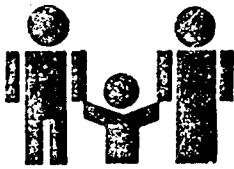
3 28-25

14. Exception Reporting (262.42)

- transporter contact (a)
- exception report (b)(1)(2)

REMARKS: 265.37(a)(4) Arrangements with Hospital ✓
 265.37(a)(1) Arrangements with Fire & Police Dept ✓
 265.52(c) Descrip Arrangements ✓
 265.52(d) home address for Emergency Coordinators ✓
~~265.52(e)~~
 265.53 submit plan ✓
 265.16 (d)(2) written job description & qualifications ✓
 265.16 (d)(3) written description & training ✓
 265.16 (d)(4) documentation of training ✓

This facility is a co-generator using an outside contractor to clean tanks



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
WESTERN REGIONAL OFFICE
Building 3
Black Mountain, N.C. 28711
(704) 669-3349

MEMORANDUM

TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: ✓ Larry Fox *LFX*
Environmental Chemist

DATE: November 19, 1982

SUBJECT: RCRA Inspection
Exxon Terminal # 4116
P. O. Box 82
Hwy #27/Moores Chapel Rd.
Paw Creek, NC 28130
EPA ID# NCD056478506
Contact: Aubrey D. Auten, Terminal Manager

*6801
Friedman Dr. (Charlotte)*

An RCRA inspection was conducted at the Exxon Terminal #4116 site on November 9, 1982. The facility was found to be in full compliance.

slg

cc: Rick Doby

Facility Information

Exxon Terminal #4116
P. O. Box 82
Hwy #27/Moores Chapel Rd.
Paw Creek, NC 28130
Mecklenburg County
EPA ID# NCD056478506

Responsible Official

Aubrey D. Auten, Terminal Manager (919) 299-3411

Survey Participants

Aubrey D. Auten, Terminal Manager
Larry Fox, Environmental Chemist, DHS

Date of Inspection

November 9, 1982, 12:30 PM - 2:30 PM

Applicable Regulations

40 CFR 262

Purpose of Survey

An RCRA inspection was conducted at the Exxon Terminal #4116 site in Paw Creek by the N. C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and record review. Regulatory requirements covered those contained in 40 CFR Part 262, Generator Standards.

Facility Description

Exxon Terminal #4116 is a petroleum fuel storage and distribution center located at N. W. edge of Charlotte in Paw Creek. Hazardous waste generated is petroleum tank bottoms from cleaning out petroleum storage tanks.

Exxon has not had a tank cleaned out since August 1980 in which Hipp Construction, 596-7493 cleaned out the tank and Caldwell Systems transported it to their TSD facility in Lenoir, NC.

Compliance

This site was in full compliance as a generator.

GENERATORS CHECKLIST

E. J. Iron Co NC D 056778506 Middlebury
 Name EPA I.D. County
A. Auten 1-3-84
 Location Contact Person Date
Z. Fry
 Field Investigator

INSTRUCTIONS: In the space provided, check the appropriate response.

	YES	NO
1. EPA identification number, if applicable (262.12)	✓	()
2. Waste Volume (261.5)		
a. *Small Generator (<1000 kg/Mo) <input type="checkbox"/>		
b. *Large Generator (>1000 kg/Mo) <input type="checkbox"/>		
(* Note: <u>Special limits on 261.33(e) list</u>)		
3. Briefly describe the plant operations and the type of waste generated. (Volume, form) _____ <u>5 kds, water gasoline</u>		
4. Where is the waste currently being disposed? _____		
5. Check Manifest (262.20 - 262.23)		
a. identification (I.D. code, name, address, date)		
b. waste information (shipping description, hazard class, quantity and unit)		
c. emergency information (immediate response information, special handling instructions, phone no.)		
d. certification: "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA".		
6. Check Containers (262.30)		
a. proper construction		
b. leaks or corrosion		
c. heat generation from incompatible wastes		

*2 - Kerosene tanks cleaned out in 1983 by Hipp Court.
 1 - gasoline tank cleaned out by Hipp Court. in 1983.
 Transp. by Bryson Ind. Service to Mitchell System, Spine Pine, N.C.*

- Continued

	<u>YES</u>	<u>NO</u>
7. Labeling practices and marking (262.31 - 262.32)		
a. DOT shipping description	()	()
b. Label saying: 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's Name and Address _____		
Manifest Document Number _____	()	()
8. Placards for transport (262.33)	()	()
9. Check accumulation time of wastes: (262.34)		
a. check records and dates	()	()
b. check containers	()	()
10. Personnel training records: (265.16)		
a. job titles (265.16(d)(1))	()	()
b. description of training (265.16(d)(2))	()	()
c. records of training (265.16(d)(3))	()	()
11. Preparedness and Prevention		
Subpart C: (265.30 - 265.37)		
1. Maintenance and operation of facility: (265.31)		
a. evidence of fire, explosion, or contamination of the environment	()	()
2. Required equipment: (265.32)		
a. alarm system (265.32(a))	()	()
b. telephone or 2-way radio (265.32(b))	()	()
c. portable fire extinguishers, fire control, spill control equipment and decontamination equipment (265.32(c))	()	()
d. water of adequate volume for hoses, sprinklers or water spray system (265.32(d))	()	()
3. Testing and maintenance of equipment (265.33)		
a. testing and maintenance procedures	()	()
b. condition of equipment	()	()

- Continued

	<u>YES</u>	<u>NO</u>
4. Access to communications or alarm systems (265.34) (unless exempt under 265.32)	()	()
5. Required aisle space (265.35)	()	()
6. Arrangements with local authorities (265.37) (Note 265.37(b))		
a. Attempted arrangements (265.37(a))	()	()
b. Agreement with state emergency response teams (265.37(Q)(3))	()	()
12. <u>Contingency Plan and Emergency Procedures</u> Subpart D: (265.50 - 265.56)		
1. Content of contingency plan (265.52)		
a. Does facility have a contingency plan (265.52)	()	()
b. Local agreements (265.52(c))	()	()
c. Emergency coordinator(s) (265.52(d)) (Phone No./qualifications)	()	()
d. Emergency equipment list (265.52(e))	()	()
e. Evacuation Plan (265.52(f))	()	()
2. Copies of contingency plan (265.53)	()	()
3. Emergency coordinator (265.55)		
a. identify emergency coordinator	()	()
b. ensure qualifications of coordinator	()	()
4. Emergency procedures (265.56)	()	()
13. Recordkeeping practices:		
a. manifests (262.40)	()	()
b. test results (262.40)	()	()
c. annual reports (262.41)	()	()
d. exception reports (262.42)	()	()
14. International shipments (262.50)	()	()

- Continued

15. Permit information:

a. Check all applicable permits held by the generator:

NPDES Permit ^{NC-0004 839/03} SPCC Plan State Permit (Specify) Air Quality
 Air Permits Local Permit RCRA Disposer Mecklenburg Co.
 RCRA Storer RCRA Treater
 Other (Specify) _____

b. In compliance Yes ___ No ___ Unknown ___ with respect to: _____
Regulation Name/#

16. Past regulatory actions:

None _____

Yes ___ If yes, summarize: _____

17. Inspection activity (past or on-going):

None _____

Yes _____

Date of Past Action _____	Performed by _____	Describe: _____

18. Remedial activity (past or on-going): (Check)

None _____

Yes _____

Describe: _____

Exxon Terminal # 4116
Paw Creek, N.C.
1-3-84

13. Annual Reporting (262.41)
 submitted (a)(1-6)
 submitted (b)

14. Exception Reporting (262.42)
 transporter contact (a)
 exception report (b)(1)(2)

REMARKS: In full compliance

MECKLENBURG COUNTY
DEPARTMENT OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL MANAGEMENT DIVISION
AIR QUALITY CONTROL SECTION

Date Issued September 28, 1983

Date Expires June 30, 1984

Certificate Number See Below

CERTIFICATE OF OPERATION

In accordance with the provisions of the Mecklenburg County Air Pollution Control Regulations,

PERMISSION IS HEREBY GRANTED TO

Exxon Corporation
Highway 27, West
Thrift, North Carolina

FOR THE OPERATION OF

Certificates of Operation numbered: 10-0005.01, 10-0005.02, 10-0005.03, 10-0005.04,
10-0005.05, 10-0005.06, 10-0005.13, and 10-0084.

See Attached.

This certificate shall be effective from September 28, 1983 until June 30, 1984 unless sooner revoked and shall be subject to the following specified conditions and limitations:

1. This certificate can be revoked at any time that it is found that said equipment operates or is operated in such a manner that it no longer complies with the provisions of the Mecklenburg County Air Pollution Control Regulations.
2. Unauthorized modifications, repairs, or alterations to the said equipment, which change its emission characteristics, will be cause for revocation of this certificate.
3. This certificate shall not exempt the holder from prosecution for emissions or discharge of air pollutants prohibited by the Mecklenburg County Air Pollution Control regulations.
4. The owner or operator shall submit all reports as may be required by the Mecklenburg County Department of Environmental Health.


Department Representative

POST IN CONSPICUOUS

PLACE NEAR EQUIPMENT

EXXON CORPORATION

<u>Cert. #</u>	<u>Operation</u>
10-0005.01	One (1) floating roof gasoline storage tank (Tank #1).
10-0005.02	One (1) floating roof gasoline storage tank (Tank #2).
10-0005.03	One (1) floating roof gasoline storage tank (Tank #3).
10-0005.04	One (1) floating roof gasoline storage tank (Tank #4).
10-0005.05	One (1) floating roof gasoline storage tank (Tank #5).
10-0005.06	One (1) floating roof gasoline storage tank (Tank #6).
10-0005.13	One (1) floating roof gasoline storage tank (Tank #13).
10-0084	Two (2) truck bottom loading facilities and one (1) McGill, Inc. Model MRC-704 gasoline vapor recovery system to be used in all tank truck loading of gasoline to control emissions.

HAZARDOUS WASTE MANIFEST

Manifest Document Number

No 44652

A. Name	I.D. Code	Address	Phone Number (area code & number)	Date Shipped or Accepted
(1) Generator <i>Exxon Co. U.S.A.</i>	<i>NC00 56428506</i>	<i>Law Creek, N.C. 28130</i>	<i>704-399-5626</i>	<i>831 11 18</i> year month day
(2) Transporter No. 1 <i>Byson Industrial Service</i>	<i>SCD 000 02312</i>	<i>411 Burton Rd. Wilmington, S.C. 29071</i>	<i>803-359-7027</i>	<i>831 11 18</i> year month day
Transporter No. 2				year month day
(3) TSDP <i>Mitchell Systems</i>	<i>NC0 991279724</i>	<i>Wilmington, N.C. Spartan Pools, N.C. 28777</i>	<i>704-728-5931</i>	<i>831 11 18</i> year month day

B. (1) Generator Item Count		(2) DOT Proper Shipping Name/Hazard Class/ DOT Identification Number	(3) Total Quantity	(4) Weight (pounds)	(5) Waste Code	(6) TSDP Item Check		(7) Quantity by Weight (pounds)
Number	Container Type					Number	Container Type	
<i>1</i>	<i>200 gallon Plastic Drum</i>	<i>sludge, water, gasoline Flammable UN 1203</i>	<i>Estimate 4000 gal</i>		<i>3</i>			

C. Emergency Response Information:
 In event of an emergency, phone the Generator at:
(919) 299-2411
 In event of a spill in South Carolina,
 call the Department at (803) 758-5531

D. Special Handling Instructions:

E. Comments:

F. This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to all applicable regulations of the U.S. DOT, U.S. EPA, the S.C. PSC and the S.C. DHEC.

Signature: *William Edgus A* Name and Title: *Kepp Const. Co. Inc.* Date: *11-8-83*

G. I hereby certify that I am an authorized representative of the transporter and that the waste(s) and quantity described in this Manifest have been accepted by us for ultimate delivery to the TSDP identified above

Transporter No. 1: *John Kelly* Signature: *Byson Ind.* Name: *Byson Ind.* Date: *11-9-83*

Transporter No. 2: _____ Signature: _____ Name: _____ Date: _____

H. I hereby certify that I am an authorized representative of the TSDP identified above and that the waste(s) and quantity in this Manifest have been accepted by me for treatment, storage, and/or disposal.

Signature: _____ Name and Title: _____



Larry Fox

Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

December 3, 1982

Mr. Aubrey D. Auten
Exxon Terminal #4116
P.O. Box 82
Paw Creek, NC 28130

Dear Mr. Auten:

On November 9, 1982 Mr. Larry Fox of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. You were found to be in compliance with the standards.

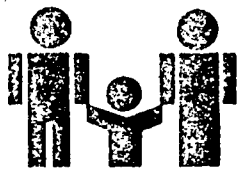
This office wishes to thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

Sincerely,

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS:nlc

cc: Mr. Larry Fox



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
WESTERN REGIONAL OFFICE
Building 3
Black Mountain, N.C. 28711
(704) 669-3349

MEMORANDUM

TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: Larry Fox *L.F.*
Environmental Chemist

DATE: November 19, 1982

SUBJECT: RCRA Inspection
Exxon Terminal # 4116
P. O. Box 82
Hwy #27/Moores Chapel Rd.
Paw Creek, NC 28130
EPA ID# NCD056478506
Contact: Aubrey D. Auten, Terminal Manager

An RCRA inspection was conducted at the Exxon Terminal #4116 site on November 9, 1982. The facility was found to be in full compliance.

slg

cc: ✓ Rick Doby

Facility Information

Exxon Terminal #4116
P. O. Box 82
Hwy #27/Moores Chapel Rd.
Paw Creek, NC 28130
Mecklenburg County
EPA ID# NCD056478506

Responsible Official

Aubrey D. Auten, Terminal Manager (919) 299-3411

Survey Participants

Aubrey D. Auten, Terminal Manager
Larry Fox, Environmental Chemist, DHS

Date of Inspection

November 9, 1982, 12:30 PM - 2:30 PM

Applicable Regulations

40 CFR 262

Purpose of Survey

An RCRA inspection was conducted at the Exxon Terminal #4116 site in Paw Creek by the N. C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and record review. Regulatory requirements covered those contained in 40 CFR Part 262, Generator Standards.

Facility Description

Exxon Terminal #4116 is a petroleum fuel storage and distribution center located at N. W. edge of Charlotte in Paw Creek. Hazardous waste generated is petroleum tank bottoms from cleaning out petroleum storage tanks.

Exxon has not had a tank cleaned out since August 1980 in which Hipp Construction, 596-7493 cleaned out the tank and Caldwell Systems transported it to their TSD facility in Lenoir, NC.

Compliance

This site was in full compliance as a generator.

1

INSPECTION FORM FOR INTERIM STATUS STANDARDS FOR
OWNER/OPERATOR OF HAZARDOUS WASTE MANAGEMENT
FACILITIES

Exxon Terminal # 4116 NC D056478506 Mecklenburg
 Name of Site P.O. Box 82 EPA I.D. County
Highway #27 / Mowens Chapel Rd, P.O. Box 82, P.O. 28130 Aubrey D. Renteria
 Location Signature of Facility Contact
11-9-82 [Signature]
 Date Signature of Inspector(s)

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

	<u>C</u>	<u>NC</u>	<u>NA</u>	<u>Violation(s)</u>
1. GENERAL	✓	—	—	_____
2. GENERAL FACILITY STANDARDS	✓	—	—	_____
3. PREPAREDNESS AND PREVENTION	✓	—	—	_____
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES	✓	—	—	_____
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING	✓	—	—	_____
6. GROUND-WATER MONITORING	—	—	✓	_____
7. CLOSURE AND POST-CLOSURE	—	—	✓	_____
8. FINANCIAL REQUIREMENTS	—	—	✓	_____
9. USE AND MANAGEMENT OF CONTAINERS	—	—	✓	_____
10. TANKS	—	—	✓	_____
11. SURFACE IMPOUNDMENTS	—	—	✓	_____
12. WASTE PILES	—	—	✓	_____
13. LAND TREATMENT	—	—	✓	_____
14. LANDFILLS	—	—	✓	_____
15. INCINERATORS	—	—	✓	_____
16. THERMAL TREATMENT	—	—	✓	_____
17. CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT	—	—	✓	_____
18. UNDERGROUND INJECTION	—	—	✓	_____

Imminent hazard YES NO
 () (✓)

Memorandum

November 12, 1982

TO: O.W. Strickland, Head
Solid & Hazardous Waste Management Branch

From: Larry Fox
Environmental Chemist

Subject: RCRA Inspection
Exxon Terminal # 4116
P.O. Box 82
Hwy # 27 / Moores Chapel Rd.
Paw Creek, N.C. 28130
EPA. ID # NCD 056478506
Contact: Aubrey D. Auten, Terminal
Manager.

A RCRA inspection was conducted at the
Exxon Terminal # 4116 site on November 9, 1982.
The facility was found to be in full compliance.

CC: Rick Doby

RCRA Inspection Report

Facility Information

Exxon Terminal # 4116
P.O. Box 82
Hwy # 27/Moore Chapel Rd.
Paw Creek, N.C. 28130
Mecklenburg County
EPA ID # NCD056478506

Responsible Official

Aubrey D. Asten, Terminal Manager (919) 299-3411

Survey Participants

Aubrey D. Asten, Terminal Mgr.
Zany Foy, Environmental Chemist, DHS

Date of Inspection

November 9, 1982
12:30 PM - 2:30 PM

Applicable Regulations

40 CFR 262

Purpose of Survey

A RCRA inspection was conducted at the Exxon Terminal # 4116 site in Paw Creek by the N.C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and

Exxon
Page 2

contained in 40 CFR Part 262, Generator Standards.

Facility Description

Exxon Terminal # 4116 is a petroleum fuel storage and distribution center located at N.W. edge of Charlotte in Low Creek. Hazardous Waste generated is petroleum tank bottoms from cleaning out petroleum storage tanks.

Exxon has not had a tank cleaned out since August 1980 in which Hipp Construction 596-7493 cleaned out the tank and Caldwell System transported it to their TSD facility in Lenox, N.C.

Compliance

This site was in full compliance as a generator.

GENERATORS CHECKLIST

NCD 056478506

~~NCD 000826909~~

Name	EPA I.D.	County
<u>Ernyon</u>	<u>Aubrey Anten</u>	<u>Maidenbury</u>
Location	Contact Person	Date
	<u>B. C. Humphreys</u>	<u>11-9-82</u>
		11-8-82

Field Investigator

INSTRUCTIONS: In the space provided, check the appropriate response.

- | | YES | NO |
|---|-----|-----|
| 1. EPA identification number, if applicable (262.12) | () | () |
| 2. Waste Volume (261.5) | | |
| a. *Small Generator (<1000 kg/Mo) <input type="checkbox"/> | | |
| b. *Large Generator (> 1000 kg/Mo) <input type="checkbox"/> | | |
| (*Note: Special limits on 261.33(e) list) | | |
| 3. Briefly describe the plant operations and the type of waste generated. (Volume, form) _____ | | |
| 4. Where is the waste currently being disposed? _____ | | |
| 5. Check Manifest (262.20 - 262.23) | | |
| a. identification (I.D. code, name, address, date) | () | () |
| b. waste information (shipping description, hazard class, quantity and unit) | () | () |
| c. emergency information (immediate response information, special handling instructions, phone no.) | () | () |
| d. certification: "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA". | () | () |
| 6. Check Containers (262.30) | | |
| a. proper construction | () | () |
| b. leaks or corrosion | () | () |
| c. heat generation from incompatible wastes | () | () |

596-7493
 Hippo construction
 Clean
 Caldwell pickup sludge

- Continued

Aug 1980

last clean tank

- | | <u>YES</u> | <u>NO</u> |
|--|------------|-----------|
| 7. Labeling practices and marking (262.31 - 262.32) | | |
| a. DOT shipping description | () | () |
| b. Label saying: 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's Name and Address _____ | | |
| Manifest Document Number _____ | () | () |
| 8. Placards for transport (262.33) | () | () |
| 9. Check accumulation time of wastes: (262.34) | | |
| a. check records and dates | () | () |
| b. check containers | () | () |
| 10. Personnel training records: (265.16) | | |
| a. job titles (265.16(d)(1)) | () | () |
| b. description of training (265.16(d)(2)) | () | () |
| c. records of training (265.16(d)(3)) | () | () |
| 11. <u>Preparedness and Prevention</u>
Subpart C: (265.30 - 265.37) | | |
| 1. Maintenance and operation of facility: (265.31) | | |
| a. evidence of fire, explosion, or contamination of the environment | () | () |
| 2. Required equipment: (265.32) | | |
| a. alarm system (265.32(a)) | () | () |
| b. telephone or 2-way radio (265.32(b)) | () | () |
| c. portable fire extinguishers, fire control, spill control equipment and decontamination equipment (265.32(c)) | () | () |
| d. water of adequate volume for hoses, sprinklers or water spray system (265.32(d)) | () | () |
| 3. Testing and maintenance of equipment (265.33) | | |
| a. testing and maintenance procedures | () | () |
| b. condition of equipment | () | () |

Aubrey
Mita

- Continued

	<u>YES</u>	<u>NO</u>
4. Access to communications or alarm systems (265.34) (unless exempt under 265.32)	()	()
5. Required aisle space (265.35)	()	()
6. Arrangements with local authorities (265.37) (Note 265.37(b))		
a. Attempted arrangements (265.37(a))	()	()
b. Agreement with state emergency response teams (265.37(Q)(3))	()	()
12. <u>Contingency Plan and Emergency Procedures</u> <u>Subpart D: (265.50 - 265.56)</u>		
1. Content of contingency plan (265.52)		
a. Does facility have a contingency plan (265.52)	()	()
b. Local agreements (265.52(c))	()	()
c. Emergency coordinator(s) (265.52(d)) (Phone No./qualifications)	()	()
d. Emergency equipment list (265.52(e))	()	()
e. Evacuation Plan (265.52(f))	()	()
2. Copies of contingency plan (265.53)	()	()
3. Emergency coordinator (265.55)		
a. identify emergency coordinator	()	()
b. ensure qualifications of coordinator	()	()
4. Emergency procedures (265.56)	()	()
13. Recordkeeping practices:		
a. manifests (262.40)	()	()
b. test results (262.40)	()	()
c. annual reports (262.41)	()	()
d. exception reports (262.42)	()	()
14. International shipments (262.50)	()	()

- Continued

15. Permit information:

a. Check all applicable permits held by the generator:

NPDES Permit SPCC Plan State Permit (Specify) _____

Air Permits Local Permit RCRA Disposer

RCRA Storer RCRA Treater

Other (Specify) _____

b. In compliance Yes No Unknown with respect to: _____
Regulation Name/#

16. Past regulatory actions:

None _____

Yes If yes, summarize: _____

17. Inspection activity (past or on-going):

None _____

Yes

Date of
Past
Action _____

Performed by _____

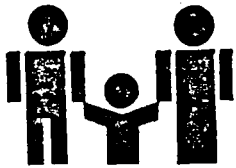
Describe: _____

18. Remedial activity (past or on-going): (Check)

None _____

Yes

Describe: _____



Larry Fox

Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

January 10, 1984

Keith Forrester
Exxon Terminal #4116
16945 N. Chase Blvd.
Houston, TX 77060
EPA NUMBER: NCD056478506


Dear Mr. Forrester:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

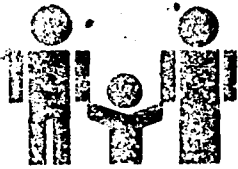
Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 01/03/84 by Mr. Larry O. Fox, Solid and Hazardous Waste Management Branch. The inspection revealed compliance with the regulations. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,


O. W. Strickland, Head
Solid and Hazardous Waste
Management Branch
Environmental Health Section

copy: Larry O. Fox



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
WESTERN REGIONAL OFFICE
Building 3
Black Mountain, N.C. 28711
(704) 669-3349

MEMORANDUM

TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: Larry Fox *L.F.*
Environmental Chemist

DATE: November 19, 1982

SUBJECT: RCRA Inspection
Exxon Terminal # 4116
P. O. Box 82
Hwy #27/Moores Chapel Rd.
Paw Creek, NC 28130
EPA ID# NCD056478506
Contact: Aubrey D. Auten, Terminal Manager

An RCRA inspection was conducted at the Exxon Terminal #4116 site on November 9, 1982. The facility was found to be in full compliance.

slg

cc: Rick Doby

Facility Information

Exxon Terminal #4116
P. O. Box 82
Hwy #27/Moores Chapel Rd.
Paw Creek, NC 28130
Mecklenburg County
EPA ID# NCD056478506

Responsible Official

Aubrey D. Auten, Terminal Manager (919) 299-3411

Survey Participants

Aubrey D. Auten, Terminal Manager
Larry Fox, Environmental Chemist, DHS

Date of Inspection

November 9, 1982, 12:30 PM - 2:30 PM

Applicable Regulations

40 CFR 262

Purpose of Survey

An RCRA inspection was conducted at the Exxon Terminal #4116 site in Paw Creek by the N. C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and record review. Regulatory requirements covered those contained in 40 CFR Part 262, Generator Standards.

Facility Description

Exxon Terminal #4116 is a petroleum fuel storage and distribution center located at N. W. edge of Charlotte in Paw Creek. Hazardous waste generated is petroleum tank bottoms from cleaning out petroleum storage tanks.

Exxon has not had a tank cleaned out since August 1980 in which Hipp Construction, 596-7493 cleaned out the tank and Caldwell Systems transported it to their TSD facility in Lenoir, NC.

Compliance

This site was in full compliance as a generator.

INSPECTION FORM FOR INTERIM STATUS STANDARDS FOR
OWNER/OPERATOR OF HAZARDOUS WASTE MANAGEMENT
FACILITIES

Exxon Terminal # 4116 NC D 056478506 Mecklenburg
 Name of Site P.O. Box 82 EPA I.D. County
 Hwy #27 / Mowen Chapel Rd, Pine Creek, N.C. 28130 Aubrey S. Aertgen
 Location Signature of Facility Contact
11-9-82 [Signature] Fox
 Date Signature of Inspector(s)

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

	<u>C</u>	<u>NC</u>	<u>NA</u>	<u>Violation(s)</u>
1. GENERAL	✓			
2. GENERAL FACILITY STANDARDS	✓			
3. PREPAREDNESS AND PREVENTION	✓			
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES	✓			
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING	✓			
6. GROUND-WATER MONITORING			✓	
7. CLOSURE AND POST-CLOSURE			✓	
8. FINANCIAL REQUIREMENTS			✓	
9. USE AND MANAGEMENT OF CONTAINERS			✓	
10. TANKS			✓	
11. SURFACE IMPOUNDMENTS			✓	
12. WASTE PILES			✓	
13. LAND TREATMENT			✓	
14. LANDFILLS			✓	
15. INCINERATORS			✓	
16. THERMAL TREATMENT			✓	
17. CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT			✓	
18. UNDERGROUND INJECTION			✓	

YES () NO (✓)

Imminent hazard

Memorandum

November 12, 1982

TO: O.W. Studdland, Head

Solid & Hazardous Waste Management Branch

From: Larry Fox

Environmental Chemist

Subject: RCRA Inspection

Exxon Terminal # 4116

P.O. Box 82

Hwy # 27 / Moores Chapel Rd.

Paw Creek, N.C. 28130

EPA. ID # NCD056478506

Contact: Aubrey D. Auten, Terminal
Manager.

RECEIVED

NOV 19 1982

WESTLAW REGIONAL
OFFICE

A RCRA inspection was conducted at the Exxon Terminal # 4116 site on November 9, 1982. The facility was found to be in full compliance.

CC: Rick Doby

RCRA Inspection Report

Facility Information

Exxon Terminal # 4116

P.O. Box 82

Hwy # 27 / Moores Chapel Rd.

Paw Creek, N.C. 28130

Mecklenburg County

EPA ID # NCDO56478506

Responsible official

Aubrey D. Arten, Terminal Manager (919) 299-3411

Survey Participants

Aubrey D. Arten, Terminal Mgr.

Zany Foy, Environmental Chemist, DHS

Date of Inspection

November 9, 1982

12:30 PM - 2:30 PM

Applicable Regulations

40 CFR 262

Purpose of Survey

A RCRA inspection was conducted at the Exxon Terminal # 4116 site in Paw Creek by the N.C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and record review. Regulatory requirements covered those

Exxon
Page 2

contained in 40 CFR Part 262, Generator Standards.

Facility Description

Exxon Terminal # 4116 is a petroleum fuel storage and distribution center located at N.W. edge of Charlotte in Paw Creek. Hazardous Waste generated is petroleum tank bottoms from cleaning out petroleum storage tanks.

Exxon has not had a tank cleaned out since August 1980 in which Hipp Construction 596-7493 cleaned out the tank and Caldwell Systems transported it to their TSD facility in Lenoir, N.C.

Compliance

This site was in full compliance as a generator.