

RCRA Inspection Report

1) Inspector and Author(s) of Report

William Kappler
Environmental Scientist
Phone: 404-562-8498
kappler.william@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, SW
Atlanta, Georgia 30303

George McBroom
Life Scientist
Phone: 404-562-8170
mcbroom.george@epa.gov

Sarah Rowell
Environmental Engineer
Phone: 404-562-9418
rowell.sarah@epa.gov

2) Facility Information

Safety-Kleen Systems, Inc. (SK)
7024 Commercial Drive
Morrow, GA 30260

EPA ID#: GAD981265424
NAICS #: 562112-Hazardous Waste Collection

3) Responsible Officials

Carl Williams
Compliance Manager
carl.williams@safety-kleen.com

4) Inspection Participants

Carl Williams, SK
Rodney Matthews, SK
David George, SK
Jeremy Morgan, SK

Sara Porter, GAEPD
William Kappler, USEPA
George McBroom, USEPA
Sarah Rowell, USEPA

5) Date of Inspection

October 29, 2024, 9:05 AM

6) **Applicable Regulations¹**

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 et seq., and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018); and Hazardous Waste Permit HW-028(S&CA)-2.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) **Purpose of Inspection**

The purpose of this inspection was for the U.S. Environmental Protection Agency, Region 4, and the Georgia Department of Natural Resources, Environmental Protection Division, to conduct an unannounced compliance evaluation inspection (CEI) to determine Safety-Kleen Systems, Inc. (hereinafter, “SK” or “facility”) compliance with the conditions of its RCRA Hazardous Waste

¹ As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Facility Operating Permit [HW-028(S&CA)-2], the applicable requirements of RCRA and the corresponding Georgia Department of Natural Resources, Environmental Protection Division (GAEPD), regulations. This was an EPA lead inspection.

8) **Facility Description**

SK, owns and operates a hazardous waste collection facility at 7207 Commercial Drive, Morrow, Clayton County, Georgia, Latitude 33.563728 and Longitude -84.341334. SK has been at its present location since 1989. In December 2012, SK was purchased by Clean Harbors, Inc. The facility uses a fleet of trucks to service customers in the area. They service a range of customers from dry cleaners to automotive repair shops. Using their fleet of trucks, they deliver clean solvents, products, and equipment and they return spent solvents and used oil for transfer to another treatment or disposal facility. SK personnel stated that this occurs within 10-days of receipt for all hazardous waste. SK has 16 employees that work at the facility. The facility's days and hours of operation are from Monday to Friday, 7am-7pm. Access to the facility is controlled through a locked, security door at the front entrance and locked security truck gate for drivers.

The facility consists of a large building containing the offices in the front, the Return and Fill Station docking area in the middle, and the back permitted warehouse space which also contains a caged area for the storage of new product for delivery to customers. The permitted warehouse space is where all incoming solvent in containers is received at an area designated for receiving. In clarification received on December 31, 2024, Carl Williams explained the management of the permitted container storage area. The company policy is to store waste for no more than 10-days, and many of the waste streams stored in the warehouse 10-day transfers where SK is not the designated facility. These are kept in designated rows in the warehouse and utilize a white "Hazardous Waste" label. The only waste stream which is kept for longer than 10-days at the SK facility is the part washer solvent stream. In general, the drums of used solvent are emptied into the Return and Fill Stations and pumped to the permitted storage tank daily. Carl Williams explained that at times, if the pump is down or there is some reason that they may not be emptied each day, then they may be kept in a designated row within the warehouse until they can be emptied. Additionally, the facility operates, a tank farm to store hazardous waste and used oil, and a mobile frac tank to separate oily water mixtures.

Carl Williams further clarified that the hazardous waste generated by the facility consists of sludge from the Return and Fill Station boxes, sampling and PPE equipment, aerosols, and samples. These hazardous wastes are kept in a designated row within the warehouse for transport to a final designated facility and the general goal is to ship these on as quickly as possible.

The facility is a large quantity generator (LQG), treatment, storage, and disposal facility (TSDF), and 10-day transfer facility with their latest Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 4, 2024. Hazardous wastes generated at the facility include, but are not limited to, the EPA waste codes D001, D004-D011, D018, D019, D021-D030, D032-D043, F002, F003, F005. The permitted activities that take place at this facility are storage of hazardous waste in containers from 5 – 55-gallon and 95-gallon overpack containers and

storage in a tank. SK's Hazardous Waste Facility Permit [HW-028 (S&CA)-2] was issued on July 26, 2017, and expires on July 26, 2027.

The permitted units at SK include:

Hazardous Waste Unit	Permitted Amount (Gallons)	Status
Container Storage Area	6,912	Operational
Storage Tank	20,000	Operational

9) Previous Inspection History

The EPA conducted a RCRA CEI on December 14, 2022, and found one (1) apparent violation of the RCRA Hazardous Waste requirements.

GAEPD has conducted two (2) RCRA CEIs at the subject facility between 2021 and 2024 and found no violations during those inspections.

On December 14, 2022, GA EPD conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

10) Opening Conference

On October 29, 2024, EPA inspectors William Kappler, George McBroom, and Sarah Rowell, accompanied by GA EPD inspector Sara Porter, entered SK at approximately 9:05 AM. Rodney Matthews, Branch General Manager, immediately received the inspectors. The inspectors were shown to a conference room where they were joined by facility personnel Rodney Matthews, David George, Jeremy Morgan, and Carl Williams (by phone), for the opening conference. The inspectors introduced themselves, showed their credentials to Rodney Matthews and David George, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (camera) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not immediately assert a business confidentiality claim.

David George provided an overview of the facilities history and current operations during the opening conference. He explained that the company is always expanding and had added new customers (waste streams), but not new waste codes. They also had not made any modifications to their facility or process. The facility is owned by a parent company, Clean Harbors, and though their overarching management comes from Clean Harbors for operations, the individual branches are generally given the authority to operate independently. The

inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representatives led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Return and Fill Station:

The Return and Fill Station is an indoor area where trucks can back up and drop off drums of spent solvent from customers and fill up new drums with clean solvent to deliver to customers. In this location are two large closeable drip boxes with drains leading to piping and a pump, under a grated walkway, which transfer the spent solvent from the return drains to the hazardous waste storage tank outside. David George indicated that the process has changed and that they no longer back up into the docking area inside to offload drums but offload them at the external dock and then wheel the drums into the Return and Fill Station from an intake area within the permitted warehouse space. In this area the facility was also storing 55-gallon poly drums of aqueous solvent that were marked or labeled as non-hazardous waste.

Inspectors followed the piping from the Return and Fill Station pour boxes to the outside wall of the building. All connections and the pump under the walkway were identified with legible numbered tags. (Photographs 6, 7, 8, and 9) The inspectors noted several joints along the ceiling within the Return and Fill Station building that appeared to be threaded and were not identified with a numbered tag. The EPA Inspectors took photographs and requested the facility provide up close photographs and information on whether the joints were welded or only threaded (Photographs 5, 16, and 17).

SK manages a SAA in this area for managing hazardous waste spent solvent sludge that is generated by the waste return process. This hazardous waste generally includes contaminated wipes and clean out debris from the Return and Fill Station. The inspectors observed one (1) 55-gallon steel container in this SAA. The container was located directly adjacent to one of the Return and Fill Stations and within 8 – 10 feet of the other return station, and it was equipped with a clampable hinged easy access lid, which was securely closed. The container was marked as hazardous waste “Solvent Sludge – Branch Generated, SOLVSLDG-MOR (D001, D006, D008, D018, D039, and D040)” and identified with toxic and flammable hazards in small lettering on the hazardous waste label. It was dated October 17, 2024. Additionally, there was a DOT flammable sticker on the container. It was recommended that they add a larger Toxic DOT label to the container to ensure this hazard was clearly visible. Facility personnel placed a toxic label on the container immediately (Photographs 1 – 4).

Permitted Container Storage Warehouse – Receiving Area:

SK utilizes an area to the right, outside of the product storage space as a receiving area for the incoming containers of hazardous and universal waste from customers.

The facility manages an SAA in this area. The inspectors observed that it held a double doored steel cabinet with samples of used oil, oily water, and spent solvents. These samples were held for 90 days in this locker, then moved to the 55-gallon steel container in a SAA next to the

cabinet. The inspectors observed the steel 55-gallon container had a clamp down lid. The bottom area of the container was dented. Inspectors later observed the container being hit by a pallet when facility staff were moving a pallet in the receiving area (Photographs 10 and 11). At the time of the inspection this container was storing waste aerosols from adhesive used to affix labels to product containers. It contained only a small quantity of aerosols. The contents were described as flammable aerosols with a profile of CRQ-MOR. The hazardous waste codes identified were D001, D035, and L02. The indicated hazards were toxic and ignitable. The inspectors observed that the container was marked with the words "Hazardous Waste" and an indication of the hazards. There was only a flammable DOT placard on the container; it was suggested that they place a toxic placard for higher visibility of the hazard as the word toxic on the Hazardous Waste label was very small and only visible up close. Further, it was requested that the 55-gallon container be replaced and moved to a location where it was less likely to be damaged.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(1)], which is a condition of the LQG Permit Exemption, if the hazardous waste is placed in containers, the large quantity generator must comply with the following: if a container holding hazardous waste is not in good condition, or if it begins to leak, the large quantity generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section.

It was noted that all required safety equipment was present within this area, and all appeared inspected and maintained. The safety shower and eye wash station were both found functional by testing on the spot.

This receiving area also held several 55-gallon containers of materials and a number of boxes of what appeared to be universal waste bulbs. Inspectors did not inspect those items at this point but moved to the central accumulation area in the warehouse.

Permitted Container Storage Warehouse - Product and Inventory Storage

SK maintains an area within the permitted container storage warehouse, which is used for storage of various new product containers and supplies for customers. There is also a fill machine within this space for transfer of products from larger to smaller containers for customer use. This area occupies two floors and is contained within a locked fence that runs from floor to ceiling. There is no storage of hazardous waste within this area.

Permitted Container Storage –Warehouse – Container Storage Area:

The container storage area is permitted to store a maximum of 6,912-gallons of hazardous waste in containers for up to one year. The warehouse is managed as a 10-day transfer area, and certain lanes are designated for this purpose. Further those containers in the transfer facility use a white "Hazardous Waste" label. On December 31, 2024, Carl Williams indicated that the only waste that the facility is listed as the designated facility is the parts washer solvent. This may be stored at times in containers within the warehouse as permitted containers due to an inability to move it to the permitted storage tank. In this case, it is kept in

certain lanes with yellow “Hazardous Waste” labels. The inspectors observed six (6) lanes for storing containers, as well as a staging/reconfiguration lane which ran parallel to the left side of the supply storage fencing. Only two (2) of the regular lanes had containers with waste material in them. Only one (1) of the regular lanes and the side lane were used for storing hazardous waste at the time of inspection, the other lanes contained product, empty containers, or non-hazardous waste. In Lane #1 inspectors observe one (1) 30-gallon steel drum which was unlabeled and unmarked (Photograph 12). Inspectors asked the facility what the unmarked drum was, and they were told it was regular tap water. Inspectors asked why there would be an unmarked drum of water in the CAA, the facility stated that it was definitely water. Rodney Matthews had personal knowledge because he filled the drum. It was to be used for priming a piece of customer equipment and the customer no longer needed it, so it was returned by the driver and placed there temporarily before emptying.

Pursuant to Section I. General Permit Conditions, I.G.5., Special Conditions Applicable to Entire Facility, of the State of Georgia Department of Natural Resources, Environmental Protection Division Hazardous Waste Permit Number HW-028 (S&CA)-2, the Permittee is prohibited from storing any waste, with the exception of dry-cleaning waste and paint material, derived from a product which did not originate at a Safety-Kleen facility without first obtaining an analysis of each customer's waste prior to the first shipment of that waste to the Morrow, Georgia facility. [Note: This condition does not apply to wastes from conditionally exempt small quantity generators as defined in Section 261.5 of the Georgia Rules for Hazardous Waste Management or waste handled on a transfer basis.]

Lane #5 contained two (2) five-gallon steel containers holding paint gun cleaner waste (D001, D018, D035, D039, D040, F003, and F005). They were indicated as being toxic and flammable and had an accumulation date of October 28, 2024. There was also one (1) 55-gallon steel container storing paint gun cleaner waste (D001, D018, D035, D039, D040, F003, and F005). It was indicated as being toxic and flammable and had an accumulation date of October 28, 2024. All containers were in good condition and closed. The containers were also labeled with the words “Hazardous Waste”, an indication of the hazards, the waste profile numbers, applicable waste codes, and the accumulation dates. It was requested that SK place larger toxic placards on the containers because the word toxic was very small on the hazardous waste labels (Photographs 13, 14, and 15). Inspectors noted that aisle space was in accordance with the permit.

The inspectors observed seven 55-gallon containers storing nonhazardous waste solids and debris and one 55-gallon container storing nonhazardous waste cleaning compound. The containers were on pallets, closed, in good condition, and labeled with the words nonhazardous waste.

Inspectors inquired about the management of the 10-day or less transfer facility containers versus the permitted container storage area. The facility indicated that they store all containers for 10-days or less and the hazardous waste is either shipped out or transferred to the hazardous waste tank using the Return and Fill Station.

Tank Farm Area:

The inspectors observed a total of six (6) tanks, one (1) tank was labeled with the words "Hazardous Waste," two (2) tanks were labeled with the words "Used Oil," one (1) tank was labeled with the words "used oil and used antifreeze," one (1) tank was labeled with the words "clean 150 solvent (product)," and one (1) tank was labeled with the words "Oily Water." All tanks were of steel construction and all but the used antifreeze tank (8,000-gallons) are 20,000-gallon tanks. The entire tank farm is covered by a steel roof structure and all tanks are surrounded by a coated concrete containment area, with an approximately 3' high concrete wall surrounding it. There were pipes running on a chase from the building across the lot to the tank farm for transferring hazardous waste, used oil, and new 150 solvent. Inspectors asked about the "Oily Water" tank, and it was indicated that the tank was used to hold used oil. The facility indicated that the tank marked "Oily Water" was now used for the storage of used oil.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(1) [40 C.F.R. § 279.22(c)(1)], containers and above ground storage tanks which store used oil, must be labeled with the words "Used Oil".

The hazardous waste tank was marked hazardous waste and labeled with appropriate hazard indicators. Inspectors observed the tank and ancillary equipment (pipe connections, flanges, valves, pumps, open-ended pipes, manway, and other connections) were marked with numbered tags to readily distinguish them from one another. The tank top was inaccessible to the inspectors. There are no access ladders on the tanks, so the facility indicated that they only examine the tank tops and pressure relief valves annually because it requires a boom arm lift to get personnel up to the top of the tanks.

Inspectors asked about the used antifreeze tank that was also marked as used oil. The facility indicated that it was repurposed from a used oil tank, and the used oil label had not yet been removed.

There was a manifold box which contained the hose connection points for connecting larger tank/vac trucks to the system to empty them into their respective tanks or remove to transport off-site. It was indicated that any wipes or debris contaminated in this procedure were placed in the SAA at the Return and Fill Station. There was a 55-gallon container located here which facility staff indicated as being for non-hazardous waste and debris. It was requested that the facility label the container non-hazardous for clarification. There was a small sump along the exterior of the secondary containment wall which the facility indicated was for catching used oil that might get spilled. Inspectors asked what the procedure was if hazardous waste made its way into the sump. The facility indicated that the sump would then be emptied out and containerized to be shipped for processing at a destination facility.

Inspectors made a physical walk around of the tank farm area. The secondary containment appeared to be in good condition with secure repairs to small cracks in the wall. The inner paint lining was in good condition and not flaking or missing. Inspectors observed all required emergency equipment was available at the site and in good condition. The area was also posted with a "No Smoking" sign.

Frac Tank:

The facility maintains a portable 18,000-gallon steel frac tank on site approximately 50 yards from the tank farm. This tank is used for the separation of oily water and subsequent pumping out of oil sludge and water. The facility indicated that the frac tank and oily water totes received inside were pumped down and shipped out every “couple” of days. There was a 55-gallon steel drum with a clamp down lid located next to the frac tank which held wipes with oily water residue for the operators pumping down the frac tank.

Staging and Segregation Area

Inspectors were taken back to the permitted warehouse space to look at the universal waste and received containers located in this area earlier in the day. Facility staff indicated that these were received for processing on October 28, 2024. Inspectors noted two (2) 55-gallon steel containers holding spent 105 solvent (D001, D018, D039, D040) which were labeled hazardous waste, indicated hazards, and had accumulation dates. Inspectors requested that larger toxic placards should be placed on these drums as the word toxic was very small.

Also in this area, inspectors noted there were 17 four-foot boxes of waste lamps. Of these boxes five (5) were labeled and dated, eight (8) were not labeled universal waste lamps, waste lamps, or used lamps, and four (4) were not dated for accumulation (Photographs 19 and 20). Inspectors indicated that this was a concern and staff labeled the waste lamp boxes appropriately and with the date October 28, 2024, prior to the inspectors departing the facility (Photographs 22 and 23). All boxes were closed.

Inspectors also noted two (2) steel containers which were not labeled at all. After looking into these containers, the facility personnel were able to determine they were new solvent that had not been labeled but had been returned from the customer site (Photograph 21).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(e), each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(c), a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The inspectors reviewed the contingency Plan. The actions that facility personnel should take in response to an emergency are described in the facility’s Contingency Plan, which was last updated in 2022.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the contingency plan (and its quick reference guide) was most recently submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee in 2017. An update for portions of the Contingency Plan were sent to the same agencies in 2022.

The inspectors reviewed the quick reference guide which included the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s). The inspectors observed a map of the facility was included but was missing the hydrant flow rates and routes of access to areas storing hazardous waste; the QRG was also missing a street map of the area surrounding the facility.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262(b)(4)-(6)] and is a condition of the LQG Permit Exemption, a generator is required to submit a quick reference guide of the contingency plan to the local emergency responders that includes: a street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; the locations of water supply; and the identification of on-site notification systems. (4) a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; and (6) The locations of water supply (e.g., fire hydrant and its flow rate).

Training Records:

The inspectors reviewed the on-line training developed by Clean Harbors for the on-line training given to employees on the RCRA regulations, contingency plan, emergency response, PPE, confined space, and hearing protection. The inspectors reviewed the SK sign-in sheets for employees that completed training in the RCRA regulations in 2023 and 2024. The inspectors reviewed the employee job titles and position descriptions for employees given training.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent from January 2, 2024, to October 7, 2024.

The inspectors observed manifest number 009217358 SKS (dated October 7, 2024), 009217349 SKS (dated October 4, 2024), 009217332 SKS (dated September 29, 2024), and 009217247 SKS (dated August 22, 2024), for container shipments of hazardous waste had the printed initials "JMO" instead of the full printed name Jeremy Morgan and signed with the initials "JMO", instead of the full signature of Jeremy Morgan.

The inspectors reviewed the hazardous waste manifests and land disposal restriction forms for bulk shipments of hazardous waste from the facilities permitted hazardous waste tank from January 9, 2024, to October 7, 2024.

The inspectors observed manifest number 009217351 SKS (dated October 7, 2024) and 009217059 SKS (dated July 8, 2024) for bulk tank shipments of hazardous waste had the printed initials "JMO" instead of the full printed name Jeremy Morgan and signed with the initials "JMO", instead of the full signature of Jeremy Morgan.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.23(a)(1)], the generator must sign the manifest certification by hand.

Daily Inspection Records:

The inspectors reviewed SK's daily inspection records on the permitted container area from March and October of 2023 and February and September of 2024.

The inspectors reviewed SK's daily inspection records on the permitted hazardous waste tank and ancillary equipment from February, June, and November of 2023 and March, May, and September of 2024. These daily inspections incorporate both the BB and CC requirements to which SK is liable.

Waste Reduction Plan:

The inspectors review SK's waste reduction plan dated October 2023 and signed on January 2024. All necessary components of the plan appeared to be present.

Leak Detection and Repair Plan:

The facility could not provide the LDR Plan at the time of the inspection and was requested to send the records by November 4, 2024. The facility provided these records as requested on November 5, 2024, due to delay in the file transfer system. The inspectors observed all procedures for the detection of leaks and identification of the connections, valves, flanges, manways, pumps, and other connections appeared to be adequate.

The inspectors reviewed a diagram of the piping system during the inspection. This diagram showed tags located at all the areas where inspectors observed tags during the inspection. It did not show tags on the connections within the Return and Fill Station building that inspectors noted may require tags.

Waste Determinations:

The inspectors reviewed the hazardous waste determinations provided by SK during the inspection. SK uses a form of knowledge-based determination. The system uses the Gibbons statistical method and a series of core waste streams based on the products provided and customer uses. This allows them to determine the expected waste codes provided a given material and customer base for that product.

Tank Design Certification:

The inspectors reviewed the original tank design certification provided on August 30, 2024. The certification outlines the waste codes for which the tank will be used, the structure of the tank and its interaction with the materials it is intended to store, and the structural analysis of the foundation and soil supporting the foundation. The certification also outlines a set of minimum shell thicknesses that are required for safe use of the tank.

Tank Assessment:

The last tank assessment was conducted on September 15, 2020. The inspectors observed the assessment consisted of a series of checklists visually checking various components of the secondary containment, tank, roof, manways, and appurtenances local to the tank. Further, the assessment outlines a series of shell thickness measurements that all fall well above the minimums provided in the original tank certification.

13) Closing Conference

The inspectors conducted the exit meeting with Rodney Matthews, David George, and Jeremy Morgan, with Carl Williams on the phone. During this meeting, the inspectors stated their preliminary conclusions of the inspection. SK agreed to provide several records to include daily inspection records for both permitted container storage and permitted tank system, tank certification, tank assessment, and photographs / documentation supporting their claim that untagged pipe joints were of a welded nature by November 4, 2024. On November 5, 2024, Carl Williams provided all requested records using Go Anywhere file transfer to Sarah Rowell.

The facility was requested to add “toxic” placards to several containers during the inspection due to very small written “toxic” on the hazardous waste labels. SK personnel placed those placards prior to the inspection team departure.

Further, the facility placed labels and dates on universal waste lamps as noted during the inspection. The inspection team went to verify this labeling prior to departure.

14) List of Attachments

Attachment A – Photograph Log

15) Signed

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2025.01.06 15:32:50 -05'00'

for William Kappler
Physical Scientist

GEORGE MCBROOM Digitally signed by GEORGE
MCBROOM
Date: 2025.01.06 14:52:37 -05'00'

George McBroom
Life Scientist

SARAH ROWELL Digitally signed by SARAH
ROWELL
Date: 2025.01.06 15:08:53 -05'00'

Sarah Rowell
Environmental Engineer

16) Concurrence

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2025.01.06 15:33:20 -05'00'

Brooke York
Acting Chief
RCRA Enforcement Section

Attachment A – Photo Log

Safety-Kleen Systems, Inc.

Morrow, Georgia

23 Photos taken on: October 29, 2024

Photos taken by: William Kappler

Photos taken with: Panasonic Camera (Model DMC-TS20)



Photograph 1: Fill and Return Station SAA 55-gallon container.



Photograph 2: Fill and Return Station SAA Hazardous Waste Label.



Photograph 3: Fill and Return Station SAA 55-gallon container.



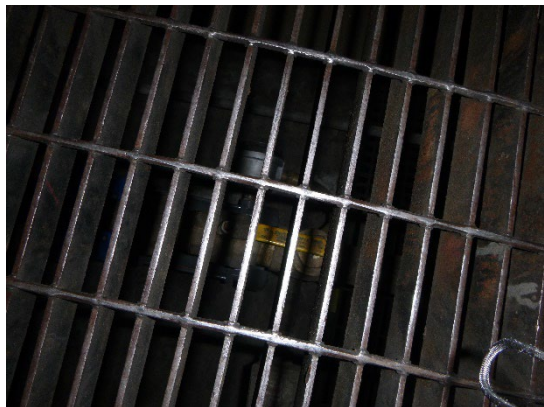
Photograph 4: Fill and Return Station SAA container with temporary "Toxic" placard.



Photograph 5: Hazardous waste piping along Ceiling, which is untagged.



Photograph 6: Hazardous waste piping from Return and Fill Station boxes.



Photograph 7: Tagged ball valve under grating and Return Station area.



Photograph 8: Tagged filter and pump under grate in Fill and Return Station.



Photograph 9: Tagged filter and pump under Fill and Return Station.



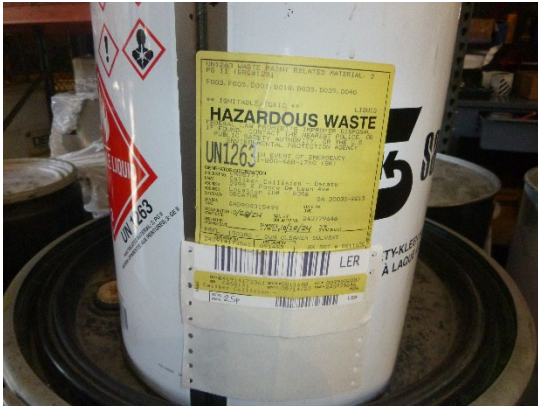
Photograph 10: Hazardous Waste label on SAA container in permitted warehouse.



Photograph 11: SAA container in permitted warehouse, showing signs of denting.



Photograph 12: Unlabeled 30-gallon container in permitted container area holding "water".



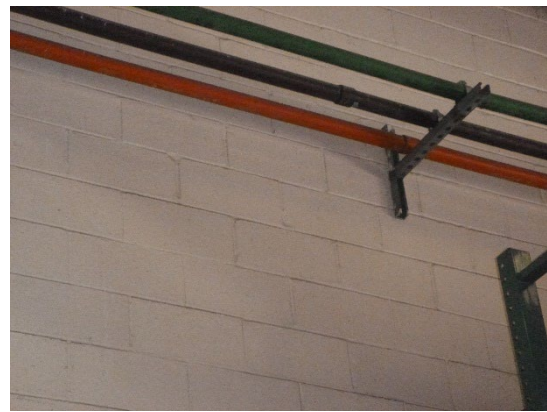
Photograph 13: 5-gallon hazardous waste container in permitted container storage.



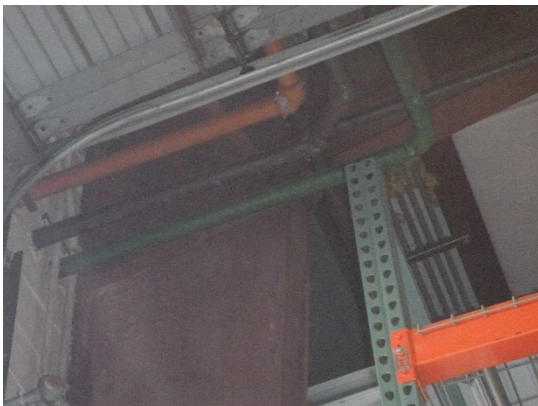
Photograph 14: 5-gallon hazardous waste container in permitted container storage.



Photograph 15: 55-gallon hazardous waste container in permitted container storage.



Photograph 16: Untagged connections in hazardous waste lines to tank.



Photograph 17: Untagged connections in hazardous waste lines to tank.



Photograph 18: Frac Tank in parking lot.



Photograph 19: Boxes containing universal waste lamps, some unlabeled.



Photograph 20: Labeled waste lamp box.



Photograph 21: 55-gallon containers of product after facility added labels.



Photograph 22: Universal waste lamp boxes with labels indicating Waste-Lamps and date.



Photograph 23: Label affixed to waste lamp which also indicated accumulation date.