

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

ECOFLO Incorporated
2750 Patterson St.
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EPA ID#: NCD980842132
NAICS #: 562211 - Hazardous waste treatment
and disposal

3) Responsible Officials

Preston Black
Environmental Compliance Manager
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4) Inspection Participants

Preston Black, ECOFLO, Inc.
Mark Burnette, NCDEQ
Anthony Foster, NCDEQ

Laurie Benton, USEPA
Sarah Rowell, USEPA

5) Date of Inspection

March 5, 2025 at 10:00 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; and the State of North Carolina Division of Waste Management Hazardous Waste Management Permit Number NCD980842132-R3.

The North Carolina Solid Waste Management Law, N.C.G.S. § § 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119.

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.

Pursuant to 15A NCAC 13A .0102(b) [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 15A NCAC 13A .0107(a) [40 C.F.R. § 273.9], a large quantity handler of universal waste (LQHUW) is a universal waste handler who accumulates 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17], a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by 15A NCAC 13A .0107(a) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 15A NCAC 13A .0107(a) [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 Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine ECOFLO Incorporated compliance with the conditions of its RCRA Hazardous Waste Operating Permit (NCD980842132-R3), the applicable requirements of RCRA, and the corresponding North Carolina Department of Environmental Quality (NCDEQ) regulations. This was an EPA lead inspection.

8) Facility Description

ECOFLO Incorporated (ECOFLO) is a comprehensive waste management and industrial services company with facilities in Greensboro, North Carolina; Americus, Georgia; and York, Pennsylvania. Services include hazardous waste RCRA classifications, packaging, segregation, manifesting, transportation, and disposal. The company has the ability to handle most any non-radioactive, non-regulated medical, or non-explosive material. The subject facility in Greensboro, North Carolina, is ECOFLO’s only hazardous waste RCRA and TSCA permitted Treatment Storage and Disposal facility. The facility in Americus, Georgia, manages non-hazardous wastes, and the location in York, Pennsylvania, is a 10-day hazardous waste transfer facility. In November of 2021, ECOFLO was purchased by Republic Services. Due to the corporate change, the ECOFLO facilities encountered administrative changes affecting container labeling, waste processing, and customer servicing. Access to the facility is controlled

with a locked fence and a locked front access. A sign in sheet and office personnel greet anyone entering.

The facility manages a wide range of hazardous waste codes, universal wastes, household hazardous wastes (HHW), and non-hazardous wastes. On August 27, 2014, the NCDEQ issued hazardous waste permit number NCD980842132-R3, which sets the conditions for ECOFLO to store and treat hazardous wastes on-site using fuel blending, neutralization, and consolidation. The hazardous waste permit is currently in the process of renewal, and ECOFLO most recently re-notified of its hazardous waste activities as part of the 2023 Biennial Report, which was submitted on April 30, 2024. No recycling is completed onsite.

Hazardous waste organics are stored in tanks P61, P62, and P63 (5,000-gallon phase layer tanks), and in tanks ST501 (5,000-gallon tank), ST201 (20,000-gallon tank), and ST101 (10,000-gallon tank). Hazardous waste organics are also stored and blended to fuel specifications in tank STP201 (20,000-gallon fuel blending tank). Tanks ST501 and ST101 are piped to tank STP201, and they are used to control the final BTU value of the blended fuel in tank STP201. According to facility personnel, ECOFLO does not use the phase layer ability of the phase layer tanks P61, P62, or P63. Containers of waste are stored in designated container storage areas based upon the levels of flammability, toxicity, compatibility, reactivity, acidity and alkalinity of their contents. The permit requires ECOFLO to evaluate one hundred percent of every individual fuels-blending waste stream and twenty five percent of every individual non-fuels waste stream for each shipment of waste that is manifested to the facility.

The facility maintains two staging areas for incoming materials and a third staging area for materials ready for processing. Incoming containers may be held in the South or West Staging Area for up to 24 hours while personnel complete quality control checks, verify the integrity of the containers, and place appropriate labels on each container. Containers that will be processed in the Decant Room may be staged in the East Staging Area for up to 96 hours. The facility does not currently track the dates for the staging areas instead Preston Black checks the areas at least once a day.

The facility receives and manages HHW from households and from HHW receiving companies. HHW may be received and sorted at the outdoor collection area in the facility yard, or it may be transported to the facility from an off-site HHW collection center. Before HHW is shipped off-site, ECOFLO performs a RCRA hazardous waste determination to characterize the waste and ship it as hazardous waste that is generated on-site. According to Section B-1(d) of the hazardous waste permit application, wastes will be managed in accordance with all applicable hazardous waste permit conditions and regulations under 40 C.F.R. parts 262 through 266, 268 and 270 once they enter the storage facility. HHW solids (lamps, batteries, etc.) are sorted, containerized, and labeled before they are brought into the storage facility for management in either the hazardous waste or the universal waste storage area. HHW liquids (pesticides, cleaning solvents, etc.) may be consolidated into larger containers in the Pour Up Room. Electronic wastes are stored outside in open totes in the Facility Yard.

Small containers of similar liquid wastes, including those that arrive through the HHW program or through lab-pack containers, are consolidated into larger containers in the Pour Up Room.

Each consolidation container is labeled to identify the type of waste inside the container and the hazards (acidic, alkaline, reactive, corrosive, specific toxicity, etc.) of that waste. Once filled, containers of consolidated wastes are then stored in the corresponding permitted container storage area. HHW may be used within the facility to treat corrosive waste in the elementary neutralization totes or it may be consolidated with like materials and disposed of as hazardous waste.

ECOFLO generally receives used aerosol cans containing four types of contents: flammable, pesticide, corrosive and foaming. The aerosol cans, which may arrive from HHW, very small quantity generator (VSQG), small quantity generator (SQG), or large quantity generator (LQG) customers, are segregated in the Aerosol Processing Area. When the operator selects the type of aerosols to be processed, he/she installs the correct liquid collection container beneath the processing unit and begins processing aerosol cans that meet the selected content type. Any aerosol cans that do not meet the type that is actively being process are placed into the appropriate designated accumulation container for later processing.

Fuels-blending fluids can be fed to the on-site tanks either from the Decant Room or from a tanker truck. If personnel determine that any container of waste destined for fuel blending contains at least 75% liquid, that container can also be placed into the Decant Room so that the liquids can be pumped from the container into a storage tank. Any solids that remain in those containers are then shipped offsite. Similarly, hazardous waste flammable liquids generated from puncturing aerosol cans on-site are analyzed in the on-site laboratory and then placed into the Decant Room where the contents are pumped from the container into an on-site storage tank.

The on-site neutralization process is designed to neutralize D002 acidic or alkaline hazardous waste in order to allow for further processing in the on-site nonhazardous waste solidification pit. Because the solidified waste will be land-disposed, the hazardous waste treated in the elementary neutralization process must not contain any additional hazardous waste codes or any underlying hazardous constituents.

ECOFLO personnel complete inspections of the Container Storage Areas and Hazardous Waste Tanks daily, and complete inspections of safety equipment, including the eyewash and self-contained breathing apparatus (SCBA), monthly. In addition, the SCBA is professionally inspected in Charlotte or Pineville annually. Organic Air monitoring is completed by Preston Black and Sam Fraelich.

9) Previous Inspection History

The NCDEQ has conducted two CEI's in the previous two years, one July 20, 2023, and one August 6, 2024 with no apparent violations. The NCDEQ, however, regularly visits the ECOFLO site frequently, approximately six times every month.

10) Opening Conference

On March 5, 2024, EPA inspectors Laurie Benton and Sarah Rowell, accompanied by NCDEQ inspectors Mark Burnette and Anthony Foster, arrived at the ECOFLO facility at approximately

10:00 AM. Preston Black, Environmental Compliance Manager, immediately received the inspectors and began the opening conference. The inspectors introduced themselves, showed their credentials to Preston Black and explained the purpose of the visit.

The inspectors described the anticipated use of a digital 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 the EPA. The company did not assert a business confidentiality claim.

Preston Black provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Preston Black led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Container Labeling

Because ECOFLO had recently been purchased by Republic, the facility was undergoing labeling changes at the time of the inspection. Personnel explained that blue labels are created using the facility's new system, and that the blue label should include the words "Hazardous Waste," the indication of hazard, the name of the constituents, the waste codes, the generating facility, the manifest number and a description of the waste type. The inspectors observed that the top portion of each blue label was affixed to the container whereas the bottom portion was not. Facility personnel explained that they affix the labels this way to facilitate waste tracking through each step of the process. As the contents of a container are processed, personnel remove the label and place it onto a piece of cardboard. Upon consolidation, each label is scanned, and a new label is created which encompasses all waste consolidated and the other labels are made obsolete. The new label is then affixed to the consolidation container, and the cardboard with all the old labels is disposed of. The facility representative explained that this procedure is designed to ensure that no container is left in-process without a label and that each consolidation container is labeled appropriately. Affixing the entire blue label to the container would make it too difficult to remove the label during processing.

At the time of the inspection, the inspectors observed several different labels affixed to some received 55-gallon containers. Although the required container labeling information should be included on each blue label, the facility noted that, in some cases, the Hazardous Waste sticker with the words "contains Hazardous or Toxic Waste" is used as an indication that the contents of the container exhibit the hazardous waste characteristic of toxicity. However, the inspectors noted that the same hazardous waste sticker was observed on the majority of hazardous waste containers, even those containers that do not contain a waste that exhibits the hazardous

waste characteristic of toxicity. The EPA inspectors noted this as an area of concern, because the words “contains Hazardous or Toxic Waste” did not clearly and consistently communicate whether the contents of each container actually exhibited the hazardous waste characteristic of toxicity.

Flammable Storage Area

The Flammable Storage Area, which is permitted to store up to 437 55-gallon containers, is inventoried daily for emergency preparedness. The facility representative, Preston Black, stated that he also scans this area every day to ensure that no containers have exceeded the permitted storage time limit. The inspectors observed the following:

1. Row 8: Two 55- gallon containers of consolidated HHW and hazardous waste, which were each labeled as toxic or hazardous waste and identified as flammable solids, but were not marked with a storage start date (Photos 1 and 2);
2. Row 7: One 55-gallon container of hazardous waste, which was not marked with a storage start date;
3. Row 13: Four 55-gallon containers of hazardous waste, which were not marked with storage start dates;
4. Row 16: One cubic yard box of hazardous waste, which was not marked with a storage start date; and
5. Row 18: One cubic yard box of hazardous waste, which was not marked with a storage start date.

A spill kit was observed in this area. The container limit did not appear to be reached.

Pursuant to Permit Condition III.C. Management of Containers, the Permittee shall manage containers in accordance with 40 C.F.R. § 264.173 as adopted in 15A NCAC 13A .0109 and as described in Section D-1 of the approved permit application. Specifically, Section D-1(a)(1) of the approved permit application states that containers are marked according to DOT and EPA specifications appropriate to their contents. These markings include the date received.

West Staging Area – 24HR Container Storage Area

All containers were labeled with the words “Hazardous Waste,” with an indication of hazards, closed and in good condition.

Toxic Storage Area

In the Toxic Storage Area, painted lines on the floor delineate specific areas for hazardous waste storage and aisle spacing. The lines delineate areas for eight rows of pallets along the far wall, three rows of pallets to the left of the entry door, and four rows of pallets to the right of the entry door. The storage capacity for this area is 250 55-gallon containers. Each container was labeled with the words “hazardous waste,” marked with an indication of the hazards of the contents, and marked with an accumulation start date unless otherwise stated. The inspectors observed the following containers:

1. Row 9: Five 55-gallon containers labeled as non-hazardous with a DOT toxic hazard placard.

2. Row 10: Two 55-gallon containers of hazardous waste without a storage start date.
3. Row 15: One 15-gallon container labeled as non-hazardous with a DOT toxic hazard placard and one 55-gallon container labeled as non-hazardous phenol tetrachloric blend with a DOT toxic hazard placard.
4. Row 16: One 30-gallon container labeled as non-hazardous with a DOT oxidizer hazard placard and one 55-gallon container labeled as non-hazardous with DOT toxic hazard and DOT oxidizer hazard placards.

The inspectors questioned the facility representative about the waste determination of containers labeled as non-hazardous but identified with DOT hazard placards. The facility representative explained that these containers in Rows 9, 15, and 16 were only labeled with the DOT hazard placards to fulfill DOT regulations, but that their contents did not exhibit the corresponding RCRA hazardous waste characteristic(s).

Pursuant to Permit Condition III. C. Management of Containers, the Permittee shall manage containers in accordance with 40 C.F.R. § 264.173 as adopted in 15A NCAC 13A .0109 and as described in Section D-1 of the approved permit application. Specifically, Section D-1(a)(1) of the approved permit applications states that containers are marked with the date received.

Laboratory Satellite Accumulation Area (SAA)

The inspectors entered the laboratory which is managed by Sam Fraelich. ECOFLO manages a SAA in the Laboratory for hazardous wastes generated in this area. The inspectors observed the following containers, with a combined storage capacity of 48 gallons of hazardous waste, in the laboratory SAA:

1. One 1-gallon container, which was observed on the counter. Personnel were actively using the container during the inspection. The container was dated February 16, 2025, and labeled as a hazardous waste oxidizer.
2. Two 20-gallon containers, which were observed next to each door to the laboratory. One container was labeled as hazardous waste flammable solids and the other was labeled as hazardous waste toxic flammable solids.
3. Two 1-gallon containers, which were observed under laboratory hoods. Each container was labeled hazardous waste. One of the two containers was marked with an indication that the contents are flammable. The second container was not marked with an indication of the hazards of its contents. Personnel immediately marked that container with an indication that it contains a flammable liquid.
4. One 5-gallon flammable can, which was labeled hazardous waste toxic flammable solids.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Alkaline Corrosive Storage Area

In the Alkaline 1 Corrosive Storage Area, painted lines on the floor delineate specific areas for hazardous waste storage and aisle spacing. The lines delineate areas for four rows of pallets along the far wall and two rows of pallets to the right of the entry. The storage capacity for this

area is 100 55-gallon containers. The inspectors observed one container, DL-7394-007185, that was identified as nonhazardous UN3266 Hydroxides, but it was also identified with the EPA waste code D002 (corrosive). Labeling containers with conflicting information does not clearly identify the contents of the container. In row 7, the inspectors observed one container was not positioned in a way to provide full view of the label.

Pursuant to Permit Condition VII. B. 2. Land Disposal Prohibitions and Treatment Standards, which incorporates 15A NCAC 13A .0112 [40 C.F.R. Part 268.50(a)(2)(i)], an owner/operator of a hazardous waste treatment, storage, or disposal facility may store hazardous waste that is restricted from land disposal in containers. Each container must be clearly marked to identify its contents with the words “Hazardous Waste”; the applicable EPA hazardous waste number(s); an indication of the hazards of the contents; and the date each period of accumulation begins.

Alkaline 2 Corrosive Storage Area

In the Alkaline 2 Corrosive Storage Area, painted lines on the floor delineate specific areas for hazardous waste storage and aisle spacing. The lines delineate areas for four rows of pallets along the far wall. The inspectors observed approximately 100 55-gallon containers in this area. The inspectors observed an eye wash and emergency shower in-between the Alkaline Corrosive Storage areas, both areas had a berm around the entire perimeter and a ramp leading into the area for forklift traffic.

Acidic Corrosive Storage Area

In the Acidic Corrosive Storage Area, painted lines on the floor delineate specific areas for hazardous waste storage and aisle spacing. The lines delineate areas for six rows of pallets along the far wall, two rows of pallets to the left of the entry, and three rows of pallets to the right of the entry. The storage capacity for this area is 153 55-gallon containers. The inspectors observed the following in this area:

1. Row 6: Six 55-gallon containers labeled as household hazardous waste with a corrosive placard.
2. Row 7: Two 55-gallon containers with bulging sides.
3. Row 8: Two 55-gallon containers with crystalized liquid on top.

The inspectors noted these as areas of concern. The facility representative claimed the containers in Row 6 were only labeled with the placard to fulfill DOT regulations.

Pursuant to Permit Condition III.A, Condition of Containers; If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or manage the waste in some other way that compliance with the requirements of this permit.

Universal Waste Storage Area

The facility stores universal waste lamps and universal waste batteries, and batteries for recycling within the storage building. The inspectors observed two pallets of universal waste lamps in this area. Each pallet contained fourteen boxes of universal waste lamps. One pallet was cling-wrapped with the fourteen boxes but was labeled as fifteen boxes. The cling wrapped pallet was labeled as universal waste lamps on four of the five visible sides, but each individual box was not labeled. Neither the pallets nor the boxes were marked with an accumulation start date. According to facility personnel, both pallets were received from HHW facilities. All boxes on both pallets were closed and in good condition.

Pursuant to 15A NCAC 13A .0119(c) [40 C.F.R. § 273.34(d)], a LQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

The inspectors also observed used batteries in the universal waste storage area. The inspectors observed one pallet of loose used batteries. The batteries were not label. The inspectors observed one 5-gallon bucket labeled as universal waste batteries and the corresponding battery type; one 15-gallon container and seven 30-gallon containers, dated February 28, 2025 and labeled as universal waste lithium batteries; four 55-gallon containers, dated March 3, 2025 and labeled as universal waste Nickel-Cadmium batteries; three 55-gallon containers, labeled as universal waste lead-acid batteries; and one 30-gallon container, labeled as only “Nickel Cadmium” and not marked with an accumulation start date (Photo 3).

Pursuant to 15A NCAC 13A .0119(c) [40 C.F.R. § 273.34(a)], a LQHUW must label or mark universal waste batteries (i.e., each battery), or a container or tank in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);”

East Staging Area – 96-hr Container Storage

The inspectors observed a row of pallets holding containers of hazardous waste in the East Staging Area. Each container was labeled with the words Hazardous Waste and with an indication of hazards, was closed and was in good condition.

NHTC/Compatible Storage Area

The inspectors observed the NHTC/Compatible Storage Area. The combined storage capacity for the compatible storage area is 633 55-gallon containers. In Row 7 of the East Side, the inspectors observed eight 55-gallon unlabeled containers. Facility personnel stated that these containers contained lyme powder.

The inspectors observed sixteen 55-gallon containers labeled “Crushed Fluorescent Bulbs,” identified with the hazardous waste code D009, and labeled as toxic (Photos 4 and 5). The containers also were labeled with the words “Bulbs,” “UNIV HHW,” and “Waste, Hazardous Waste Solid.” The generator on the label was listed as ECOFLO. The containers were not marked with an accumulation start date, with an internal tracking label (blue label), or with an

identification number. Six containers contained a manifest ID ending in 7701. Multiple labels with conflicting information on the same container does not clearly and consistently communicate the identity and hazards of the contents of the container.

Pursuant to Permit Condition III. C. Management of Containers, the Permittee shall manage containers in accordance with 40 C.F.R. § 264.173 as adopted in 15A NCAC 13A .0109 and as described in Section D-1 of the approved permit application. Specifically, Section D-1(a)(1) of the approved permit applications states that containers are marked according to DOT and EPA specifications appropriate to their contents. These markings include DOT shipping information; EPA waste codes; date received; and ID number allowing reference to the material characterization form and manifest.

Decant Room:

The inspectors observed the Decant Room. Historically, this room included the use of an auger to facilitate the removal of sludge-like material from containers prior to pumping the contents into the hazardous waste storage and fuel blending tanks. The room is designed to be under negative pressure when the auger is in use, and special personal protective equipment (PPE) was required to operate the auger. At the time of the inspection, the Decant Room was not in use as originally designed. According to facility personnel, the auger is not functional, and the facility does not plan to repair or use the auger in the future. This room is now used only to pump hazardous waste liquids from containers into the appropriate hazardous waste storage tank(s) (i.e. pesticides, flammables, etc.) The inspectors observed a thick coating of unknown dried material along the walls and on the floor and detected a strong solvent smell inside the room. The inspectors noted this as an area of concern and recommended the room be cleaned to prevent any potential releases into the environment.

Satellite Accumulation Area:

The facility manages a SAA outside the Decant Room for managing hazardous waste PPE that is generated in the processing areas. The inspectors observed one 55-gallon container in this SAA (Photo 6). The container was located in front of the start of the conveyor belt to the Decant Room, and it was equipped with a lid, which was closed. The container was marked as waste flammable solids, hazardous or toxic wastes, and identified as used PPE.

Aerosol Can Processing Area:

ECOFLO generally receives used aerosol cans containing four types of contents: flammable, pesticide, corrosive and foaming. According to the permit application, aerosol cans containing flammables, pesticides, or corrosives are punctured on-site, but aerosol cans containing expansion/foaming materials are not punctured onsite. Instead, personnel package those cans into separate 55-gallon containers and ship them off-site as hazardous waste.

The first step in processing used aerosol cans is to sort them into compatible categories. The three types of aerosols which are punctured are then punctured according to the type. The facility generates hazardous waste liquids by puncturing universal waste aerosol cans using two

industrial size aerosol puncturing machines and two manual aerosol puncturing devices in the Aerosol Processing Area. Facility personnel stated that one employee is responsible for processing aerosol cans on-site. Because aerosol cans may arrive onsite from HHW collection, VSQGs, SQGs, or LQGs, they may be generated as “Universal Waste,” “Hazardous Waste,” or “Household Hazardous Waste.” Used aerosol cans may also be generated on-site.

At the time of the inspection, both industrial size aerosol puncturing machines were out of service, and one of the machines had been sent out for maintenance. Because the industrial puncturing machines were not operational, the facility was using the manual aerosol puncturing devices to process aerosol cans. It appears that ECOFLO has designated a SAA for each puncture device to accumulate hazardous waste from the aerosol cans. The inspectors observed one 55-gallon container beneath the industrial size aerosol puncturing machine and one 55-gallon container beneath each manual aerosol puncturing device. Each container was labeled as hazardous waste flammable liquid and marked with an accumulation start date. The container beneath the industrial device was dated December 10, 2024; the container beneath one manual puncturing device was dated March 3, 2025; and the container beneath the other manual puncturing device was dated March 5, 2025. The inspectors noticed a strong solvent odor in this area and observed a hole in the container beneath one of the manual puncturing devices (Photo 7).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

At the time of the inspection, aerosol cans containing flammables were being processed and aerosol cans containing adhesives or pesticides were being sorted out and accumulated in containers. The inspectors observed three 55-gallon containers of pesticide aerosol cans, two 55-gallon containers of adhesive aerosol cans, and one empty 55-gallon container. Two of the three containers of pesticide aerosol cans were labeled as “HHW – 28 – 006” and “pesticides”. None of the containers of sorted aerosol cans were marked with an accumulation start date, with the words “Universal Waste” or “Hazardous Waste” or “Household Hazardous Waste” or with an indication of the hazards of its contents.

Pursuant to Permit Condition III. C. Management of Containers, the Permittee shall manage containers in accordance with 40 C.F.R. § 264.173 as adopted in 15A NCAC 13A .0109 and as described in Section D-1 of the approved permit application. Specifically, Section D-1(a)(1) of the approved permit applications states that containers are marked according to DOT and EPA specifications appropriate to their contents. These markings include DOT shipping information; EPA waste codes; date received; and ID number allowing reference to the material characterization form and manifest.

Flammable Pour Up Area

The facility uses the area that is adjacent to the aerosol processing area and just outside of the Consolidation Room to consolidate compatible flammable wastes that arrive on-site in smaller containers, which are typically received through the HHW collection program or as lab packs. Personnel open each small container and are pour its contents into an accumulation container, typically a 55-gallon container. When full, the contents of each consolidation container are then sampled and analyzed in the on-site laboratory. If analysis confirms that the container contents meet permit requirements, personnel move the container to the Decant Room, where its contents are pumped into the appropriate storage tank. At the time of the inspection, the inspectors observed four 55-gallon consolidation containers in the Flammable Pour Up Area. Each container was labeled as "HW UN1993 Flammable Liquid," but none were marked with an accumulation start date.

Pursuant to Permit Condition III. C. Management of Containers, the Permittee shall manage containers in accordance with 40 C.F.R. § 264.173 as adopted in 15A NCAC 13A .0109 and as described in Section D-1 of the approved permit application. Specifically, Section D-1(a)(1) of the approved permit applications states that containers are marked according to DOT and EPA specifications appropriate to their contents. These markings include DOT shipping information; EPA waste codes; date received; and ID number allowing reference to the material characterization form and manifest.

Located adjacent to the flammable pour up area the inspectors observed a pallet of 18 cubic foot cardboard boxes (Photo 8). The boxes were shrink-wrapped together, and identified with a single hazardous waste label, which identified the contents as D001 hazardous waste extracts, flavoring liquid. These containers were being stored and will be handled as part of the flammable pour up waste.

Consolidation Room

The inspectors entered the consolidation room which is managed by Darrel Coble. The two long sides of the room are lined with 55-gallon containers for consolidating different waste streams, and one corner of the room contained five totes used for elementary neutralization. In this room, personnel transfer HHW and HW from small containers into larger consolidation containers according to the identified waste stream. The inspectors observed containers inside the Consolidation Room along the wall separating it from the Aerosol Can Processing Area, including:

- One 55-gallon container labeled UN2811, F002, F003, F005, D001, D035, D038 hazardous waste (MEK, pyridine), dated March 4, 2025, and identified with a DOT hazard sticker to indicate that the contents are toxic.
- One 55-gallon container labeled UN1993, D001, D035, F001, F002, F003, F005 hazardous waste (acetone, methanol), dated February 29, 2025, and identified with a DOT hazard sticker to indicate that it contains a flammable liquid.
- One 55-gallon container labeled hazardous waste solid, dated November 14, 2024, and identified with a DOT hazard sticker to indicate that it contains a flammable solid.

- One 55-gallon container labeled NA3077, D009, D004, D005, D006, D007, D008 hazardous waste, and identified with a DOT Class 9 hazard sticker.
- One 55-gallon container labeled UN3266, hazardous waste (sodium hydroxide and ammonia), dated January 7, 2025, and identified with a DOT hazard sticker to indicate that the contents are corrosive.
- One 55-gallon container labeled UN3267, D002 hazardous waste (amines, hydroxides), dated February 6, 2025, and identified with a DOT hazard sticker to indicate that the contents are corrosive.
- One 55-gallon container labeled UN3266, D002 hazardous waste (calcium hypochlorite, lithium hypochlorite), and identified with a DOT hazard sticker to indicate that the contents are corrosive.
- One 55-gallon container (just outside of the room) labeled UN2903, D001, F002, F003, U138 hazardous waste (pesticides), dated March 3, 2025, and identified with DOT hazard stickers to indicate that the contents are toxic and flammable.
- One 55-gallon container labeled UN3264, D002 hazardous waste (chromic acid, sulfuric acid, hydrochloric acid), dated February 11, 2025, and identified with a DOT hazard sticker to indicate that the contents are corrosive.
- One 55-gallon container labeled UN3265, D002 hazardous waste (formic acid, oxalic acid), dated February 20, 2025, and identified with a DOT hazard sticker to indicate that the contents are corrosive.
- One 30-gallon container labeled household hazardous waste (oxygen cylinder) and dated March 5, 2025.
- One empty 30-gallon container.
- One 30-gallon container labeled UN1479 nonregulated pool (trichloro/dichloro) and identified with a DOT hazard sticker to indicate that the contents are an oxidizer.
- One 30-gallon container labeled UN1479, hazardous waste (hypochlorite, lithium hypochlorite), dated February 6, 2025, and identified with a DOT hazard sticker to indicate that the contents are an oxidizer.

The inspectors observed additional containers along the opposite wall inside the Consolidation Room. These containers included one 55-gallon container, one 30-gallon container, six 20-gallon containers, and eleven 5-gallon containers. Personnel explained that these containers are used to consolidate smaller volumes of very specific waste streams.

According to personnel working in this area, the consolidation containers are marked with the date that material is first placed into the container rather than the date that the oldest material entering the container was received on-site. Although it appears that the majority of this waste comes from the HHW collection program, please note that consolidation containers that receive any waste from lab packs should not be identified with a start date that occurs after the date that the lab pack was received onsite.

Indoor/Outdoor Container Storage

Outside the main facility warehouse the facility maintains two container storage rooms (Alkaline Reactive Storage Room and Acidic Reactive Storage Room). Each room is enclosed and secured with a door. These rooms contained only Hazardous Waste at the time of the

inspection. All containers were labeled with the words Hazardous Waste, indication of hazards, closed and in good condition.

The inspectors observed approximately 30 containers in the Alkaline Reactive Storage Area, including three 55-gallon containers labeled as D002, D003, D006, D011 characteristic hazardous waste reactive cyanide, cadmium cyanide. At the time of the inspection, one container appeared to be sweating, as the inspectors observed moisture on the outside of the container. The inspectors noted this as an area of concern, because the container was storing a water-reactive hazardous waste.

The inspectors observed approximately 4 containers in the Acidic Reactive Storage Area.

Tank Farm

The inspectors observed seven hazardous waste organics storage tanks in the tank farm area: P61, P62, P63 (5,000-gallon phase layer tanks), STP201 (a 20,000-gallon fuel blending tank), ST501 (a 5,000-gallon tank), ST201 (a 20,000-gallon tank), and ST101 (a 10,000-gallon tank). Each tank was labeled as hazardous waste and identified with a National Fire Protection Association (NFPA) diamond hazard rating system sign to indicate the hazards of its contents.

Roll off

ECOFLO routinely consolidates hazardous waste solids into a roll-off container, which is stored in a designated area near the tank farms and tanker loading/unloading area. Full roll-off containers are shipped to one of two hazardous waste treatment, storage and disposal facilities approximately once or twice each month. The specific hazardous waste solids that are consolidated into the roll-off are dependent upon the intended destination facility for that container. Facility personnel stated that high BTU hazardous waste debris was being consolidated in the roll-off container that was observed in this area at the time of the inspection. The container was tarped and labeled as hazardous waste flammable solids organics with waste codes D001, D035, F001, F002, F003, F005.

Building 3

The inspectors observed the solidification area in Building 3 where the facility solidifies non-hazardous waste using wood chips as a solidification agent.

Facility Yard

The inspectors observed areas identified for receiving HHW and for storing electronic waste in the Facility Yard.

12) Records

Daily inspection records were reviewed onsite. The following records were requested at the end of the closing conference to be sent to Laurie Benton and Sarah Rowel by email.

1. Financial Assurance
2. BB and CC Records
3. Tank Records
 - a. Thickness and integrity tests
4. Permit
5. Contingency Plan and notification to responders
6. Quick Reference Guide and notification to responders

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which was last updated on June 8, 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; it lists the names and emergency telephone numbers for persons identified as emergency coordinators (Marcus Moton, Stuart Stapleton, and Kevin Fulp are listed in the order in which they will assume responsibility as the emergency coordinator); and it includes an evacuation plan for personnel. The evacuation plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

The contingency plan describes arrangements agreed to with the local police departments, fire departments, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee, and it specifically includes acknowledgement letters from the Greensboro Police Department, the Guilford County Department of Emergency Services, A & D Environmental Services, Inc., Republic Services, Shamrock Environmental, Concentra, Pace Analytical Services, Inc., and the Greensboro Fire Department.

The contingency plan includes a list of emergency equipment at the facility. The list includes self-contained breathing apparatus (SCBA), respirators and cartridges, goggles, hard hats with face shields, Tyveks, HazMat boot covers, gloves, first aid kits, pumps, bung wrenches, container de-headers, explosion-proof flashlights, oil sorbents, lime, 85-gallon over pack containers, fire extinguishers, safety showers, eyewashes, fire detection equipment, manual fire alarms, and automatic sprinkler systems. The plan includes a physical description and the general location(s) of each item on the list, and a brief outline of its capabilities.

A copy of the Contingency Plan was most recently submitted to the Greensboro Police Department, the Guilford County Emergency Management Agency, A & D Environmental, Republic Services, Shamrock Environmental Corporation, Concentra, Pace Analytical Services, the Greensboro Fire Department, and the Guilford County Sheriff's Office on June 4, 2024.

Pursuant to Permit Condition I.F.3., which incorporates 15A NCAC 13A .0109 [40 C.F.R. § 264.53(a)] and Section G of the permit application. Specifically, Section G-6 of the permit application, Coordination Agreements, states that a copy of the contingency plan must be

submitted to organizations, which include US Healthworks and Research and Analytical Laboratories.

Ecoflo did not provide the inspectors with a copy of a quick reference guide of the contingency plan or records that a quick reference guide was submitted to the local emergency responders.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.262 (b)], a large quantity generator that is amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders. The quick reference guide must include (1) the types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time; (2) the estimated maximum amount of each hazardous waste that may be present at any one time; (3) the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (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; (6) the locations of water supply (e.g., fire hydrant and its flow rate); (7) the identification of on-site notification systems; and (8) the name of the emergency coordinator(s) and 24/7-emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and training requirements included in Section H of the RCRA permit application. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. All TSD and Field Services Personnel are required to complete annual RCRA Regulatory Review Training, and Administrative Personnel receive annual RCRA Paperwork training. The inspectors reviewed employee names and the most recent RCRA Hazardous Waste Management and Compliance Training certificates that were provided for TSDF Technicians, Outbounds Coordinator, Heavy Equipment Operator, Environmental Compliance Manager, Chemical Processing Operators, ES Field Supervisor, Administrative Assistant, Operations Supervisors, Maintenance Technicians, Receptionist, Transportation Supervisor, Customer Specialist Lead, Laboratory/Facility Technician, and Chemist. All employees completed RCRA Hazardous Management and Compliance Training within one year prior to the inspection. Most employees completed this training on July 30, 2024, and the oldest record of training was dated June 8, 2024.

Tank Records:

The facility maintains seven tanks listed in Table 1. Inspectors reviewed the daily inspection records for these tank systems. Inspections were completed by Darrel Coble and Preston Black. No inspections took place on holidays or weekends when the facility was closed. The inspectors reviewed the records of Vapor Pressure Profiles corresponding to the tank used, which were submitted via email.

Table 1				
Tank	Volume (gal)	Inspection Req. (yrs)	Most recent inspection	Tank Purpose
P61	5,000	5	March 11, 2022	phase layer tanks which store hazardous waste organics
P62	5,000	2.5	May 20, 2024	phase layer tanks which store hazardous waste organics
P63	5,000	5	April 15, 2020	phase layer tanks which store hazardous waste organics
ST501	5,000	2.5	July 5, 2023	hazardous waste organics storage tank
ST101	10,000	5	March 11, 2022	hazardous waste organics storage tank
ST201	20,000	5	August 17, 2023	hazardous waste organics storage tank
STP201	20,000	5	January 11, 2024	Fuel blending tank

Integrity tests and inspections are required for each tank with different frequency requirements. The tank integrity tests were reviewed. At the time of the inspection, all integrity tests and inspections were up to date. The deadline for Tank P63 the tank inspection is due April 15, 2025. Table 2 shows the shell thickness for each tank.

Table 2					
Tank	Most recent inspection	Shell Thickness (in)	Corrosion Rate (in)	Life Expectancy	Recommended Re-Inspection
P61	March 11, 2022	0.123	0.003	7 years	5 years
P62	May 20, 2024	0.174	UD	13 years	10 years
P63	April 15, 2020	0.164	0.006	13 years	10 years
ST501	July 5, 2023	0.159	0.01	2 years	2 years
ST101	March 11, 2022	0.240	0.0026	33 years	10 years

ST201	August 17, 2023	0.283	0.000	20 years	10 years
STP201	January 11, 2024	0.230	0.012	9 years	5 years

13) Closing Conference

The USEPA inspectors Laurie Benton and Sarah Rowell and NCDEQ inspectors Mark Burnette and Anthony Foster conducted an exit meeting with Preston Black at 3:00 PM. During this meeting, the inspectors stated their preliminary conclusions of the inspection. ECOFLO agreed to provide the requested records by March 7, 2025.

In an email to USEPA inspectors Laurie Benton and Sarah Rowell and to NCDEQ inspector Mark Burnette on March 6, 2025, Preston Black provided records of vapor pressure profiles, a copy of the contingency plan with transmittal letters to emergency responders, and tank integrity testing reports for P61, P62, P63, ST501, STP201, ST101, and ST201. Preston Black also informed the EPA and NCDEQ that P63 is scheduled to be inspected April 3, 2025.

In an email to USEPA inspectors Laurie Benton and Sarah Rowell and to NCDEQ inspector Mark Burnette on March 7, 2025, Preston Black provided certificates of RCRA training that was completed by facility personnel.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

SARAH ROWELL Digitally signed by SARAH ROWELL
Date: 2025.05.22 14:31:15 -04'00'

Sarah Rowell
Environmental Engineer

LAURIE BENTON Digitally signed by LAURIE BENTON
Date: 2025.05.22 15:17:56 -04'00'

Laurie Benton
Environmental Engineer

16) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ
Date: 2025.05.23 09:00:43 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

8 Photos taken on: March 5, 2025

Photos taken by: Laurie Benton

Photos taken with: Panasonic DMC-TS5

EPA Property Tag: S09533



Photo 1 (P1010539.JPG): Hazardous waste container label Row 8 Flammable Storage Area.



Photo 2 (P1010540.JPG): Hazardous waste container label Row 8 Flammable Storage Area.



Photo 3 (P1010541.JPG): Universal waste battery container labeled as "Nickel-Cadmium" in the Universal Waste Area.



Photo 4 (P1010541.JPG): Hazardous waste contains with crushed mercury containing lamps NHTC/Compatible Storage Area.



Photo 5 (P1010541.JPG): Hazardous waste container label, "crushed mercury containing bulbs" NHTC/Compatible Storage Area.



Photo 6 (P1010541.JPG): Container in SAA for managing used PPE in front of the Decant Room.



Photo 7 (P1010541.JPG): Hole in the top of a container used to accumulate liquids generated from aerosol can puncturing device in the Aerosol Processing Area.



Photo 8 (P1010541.JPG): Boxes of hazardous waste waiting for pour up in the Pour Up Area.