

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

SEPTEMBER 10, 2020

BASIC INFORMATION

Facility Name: Safety-Kleen Systems, Inc. – **Facility Location:** 2801 S Tejon St.
Englewood Englewood, Colorado 80110

Resource Conservation and Recovery Act
(RCRA) ID: COD000716621

Notification Status: Treatment, storage, and disposal facility(TSDF); 10-day transfer facility **Facility Contact:** Rocky Gray, Branch Manager
303-761-8614

Opening Conference: 1-3 p.m., July 21, 2020 (via MS Teams)

Monitoring and Sampling: July 22, 2020 (on-site)

Closing Conference: 2-3 p.m., July 23, 2020 (via MS Teams)

Lead Inspector: Cindy Schafer, Environmental Engineer, EPA Region 8

Other Attendees:

1. Kristie McNeill, Environmental Scientist, EPA Region 8 (July 21 and 23 only)
2. Craig Lutz, Environmental Engineer, EPA National Enforcement Investigations Center (NEIC)
3. Laura Kanopkin, Environmental Engineer, EPA NEIC
4. Jeremy Deyoe, Environmental Engineer, EPA NEIC
5. David Foster, Environmental Protection Specialist, Colorado Department of Public Health and Environment (CDPHE)
6. Nick Culian, Site Compliance Manager, Safety-Kleen (July 21 and 23 only)
7. Mori Sorenson, Vice President of Environmental Compliance, Safety-Kleen (July 21 and 23 only)
8. Rocky Gray, Branch Manager, Safety-Kleen
9. Brent Craig, District Manager, Safety-Kleen (July 21 and 23 only)
10. Beau Wildenhain, Service Manager (July 22 only)
11. Justin McCall, Material Handler (July 22 only)

Type and Purpose of Inspection: Focused Compliance Inspection

Inspection focused on compliance with RCRA air regulations in 40 C.F.R. Part 264, Subparts AA, BB and CC [6 CCR 1007-3 Part 264, Subparts AA, BB and CC]

Facility Type: Hazardous Waste Storage Facility

Inspection Type: Announced Inspection
Joint EPA and State Inspection with CDPHE

Facility Name: Safety-Kleen Systems Inc. - Englewood
Facility Location: 2801 S Tejon St, Englewood, Colorado 80110
Date of Inspection: July 21-23, 2020

OPENING CONFERENCE

- | | |
|---|--|
| ☒ Credentials Presented | ☒ Confidential business information (CBI) warning to facility provided |
| ☒ Small Business Resources Information Sheet provided to facility contact | ☐ CBI was provided or discussed during the inspection |

The following information was obtained verbally during the inspection from Safety-Kleen representatives unless otherwise noted.

Company Ownership: The facility has been owned and operated by Safety-Kleen since 1973. In 2013, Safety-Kleen became part of Clean Harbors, Inc.

General Facility and Process Description: The Safety-Kleen Englewood facility has a 12,000-gallon hazardous waste storage tank for storing spent solvent prior to sending the spent solvent off-site for reclamation. Safety-Kleen Englewood has a return and fill station where containers of spent solvent are dumped, cleaned and re-filled with product solvent and reloaded onto service trucks. The spent solvent is pumped from the dumping station to the hazardous waste storage tank.

The Safety-Kleen Englewood facility also operates as a 10-day transfer facility for shipments of hazardous waste. The 10-day storage area is located in the main building in an area called the flam room.

Safety-Kleen Englewood also stores product solvents in three storage tanks onsite including a methanol tank, a glycol tank and a 150-flash point product solvent tank.

Staff Interview: Safety-Kleen Englewood supplies customers with numerous products that are stored at the facility including: oil and grease products, antifreeze, aqueous cleaners, parts cleaning solvents and parts washer stations. Used oil and waste antifreeze containers are collected by Safety-Kleen Englewood and transported to a different facility for recycling and/or disposal. Safety-Kleen Englewood stores the used oil retain samples collected from the used oil containers that they transport. Safety-Kleen Englewood distributes two parts washer solvents, a 150-flash point product solvent and a 105-flash point product solvent. The spent 150-flash point solvent containers are collected by Safety-Kleen Englewood, the containers are emptied and cleaned in the return and fill station and the waste is collected in a 12,000-gallon hazardous waste tank and then sent to a Safety Kleen facility in Illinois for reclamation. The spent 105-flash point solvent is sent to a Clean Harbors facility for disposal and it is not reclaimed.

Safety-Kleen Englewood has a continued use program (CUP) for some 150-flash point solvent customers. Safety-Kleen Englewood uses spent 150-flash point solvent from customers that do not significantly contaminate the spent 150-flash point solvent to clean spent 150-flash point solvent containers. The spent 150-flash point solvent from CUP customers is not considered waste by Safety-Kleen Englewood until it is used to clean a spent 150-flash point solvent container in the return and fill station.

Facility Name: Safety-Kleen Systems Inc. - Englewood

Facility Location: 2801 S Tejon St, Englewood, Colorado 80110

Date of Inspection: July 21-23, 2020

Safety-Kleen Englewood has two return and fill stations; only one was in use at the time of the inspection. The second (south) return and fill station does not have a CUP tank and it is only used when the first (north) return and fill station is not operational.

Safety-Kleen Englewood collects used solvent from customers that are registered as large quantity generators (LQG), small quantity generators (SQG), and very small quantity generators (VSQG).

The 12,000-gallon hazardous waste tank was emptied about every two-three weeks this year. Last year the tank was emptied about every 10-14 days. The spent 150-flash point solvent is in heavy liquid service. The facility conducts daily tank inspections under Subpart J and annual visual inspections of the tank as required by CC. The staff at the Safety-Kleen Englewood facility have not reported any leaking components in the seven years that Rocky Gray has been working at the facility.

Staff at Safety-Kleen Englewood do not conduct testing at the facility to demonstrate that the spent 150-flash point solvent is in heavy liquid service. Instead, staff at the facility rely on testing conducted at other Safety Kleen facilities around the country. Staff at Safety-Kleen Englewood use a similar process for its hazardous waste determination for the 150-flash point solvent and for its non-hazardous waste determination for the spent aqueous cleaner.

TOUR INFORMATION

Areas of the facility toured: The on-site inspection team toured the following areas:

- Main warehouse where used parts cleaning stations are dismantled and new or refurbished parts cleaning stations are stored.
- Aqueous cleaner containers are stored. The facility empties waste aqueous cleaner containers using a vac truck which takes the waste to a wastewater treatment plant for disposal.
- Oil room where retain samples are stored. Used oil is not stored at the Safety-Kleen Englewood facility; Safety-Kleen Englewood trucks that pick up used oil bring it to Thermofluids for recycling. Safety-Kleen Englewood does distribute semi-synthetic and full-synthetic oil.
- South storage room where non-hazardous wastes are stored.
- Shipping area where products and wastes are staged before being loaded onto trucks. There was no waste in the shipping area at the time of the inspection.
- 10-day area or flam room where hazardous wastes and flammable products are stored. This area is also permitted for storage up to one year, but staff at Safety-Kleen Englewood do not currently store hazardous wastes in this area for more than 10 days.
- Upper warehouse where the aqueous cleaner and aqueous waste is stored.
- Return and fill area where the spent 150-flash point solvent containers are dumped, cleaned and refilled.
- Tank farm area where the 12,000-gallon hazardous waste tank for storing spent 150-flash point solvent and three product tanks are located.

Sampling Results: The inspection team collected samples of spent 150-flash point solvent from three different containers from three different Safety-Kleen Englewood customers. The results of the sampling confirm that the spent 150-flash point solvent is in heavy liquid service. (See the analytical report summary in Appendix A.)

Facility Name: Safety-Kleen Systems Inc. - Englewood
Facility Location: 2801 S Tejon St, Englewood, Colorado 80110
Date of Inspection: July 21-23, 2020

Data Collected and Observations: As part of the on-site portion of the inspection, the inspection team conducted a comparative monitoring campaign using Method 21 and audio, visual and olfactory inspections for equipment associated with the return and fill station and the hazardous waste tank that is subject to 6 CCR 1007-3 Part 264, Subpart BB. The inspection team identified one leaking component, a check valve with tag number 028. The leak was identified visually. (See photos 2-4 in Appendix B.)

Records Review: The inspection team reviewed the following records:

- RCRA permit Part IV: Storage in Tank
- Subpart BB tagging plan
- Tank inspection results for June 22, 2020 and July 14, 2020
- BB inspection results for June 23, 2020 and July 16, 2020
- Container storage area inspection results for June 22, 2020 and July 16, 2020
- Return and fill area inspection results for June 25, 2020 and July 8, 2020
- CC container inspection results for June 26, 2020, July 10, 2020, July 21, 2020, January 4, 2019, and January 3, 2018
- Safety data sheet for the 150-flash point solvent
- Heavy liquid service determination for the 150-flash point solvent
- List of used 150-flash point solvent shipments from April 1-June 30, 2020
- Shipping documents for VSQG, SQG, non-haz, and CUP customer solvent waste streams provided as examples of how each solvent waste stream is shipped
- Analytical results for hazardous waste determination for the spent 150-flash point solvent
- Analytical results for the non-hazardous waste determination for the spent aqueous solvent
- Haz and non-haz waste spent 150-flash point solvent and spent aqueous cleaner profiles
- Shipping documents for the three containers that were sampled by the EPA inspection team
- Shipping documents from June 29, 2020 for generators without a generator ID
- Repair document for leak identified by the EPA inspection team

Inspection Logbook No.: 2020-0004 Pages: 1-10

CLOSING CONFERENCE

The closing conference was held via MS Teams on July 23, 2020 from 2-3 p.m.

Compliance Assistance: A link to the EPA's Small Business Assistance worksheet was provided at the beginning of the inspection.

Deficiencies or Concerns: During the on-site portion of the inspection, the EPA inspection team noted that there are four valves inside both the north and south return and fill station that are not included on the Subpart BB monitoring component list. These components are in heavy liquid service and should be monitored per to 6 CCR 1007-3 § 264.1058. (See Attachment 1.)

Facility Name: Safety-Kleen Systems Inc. - Englewood
Facility Location: 2801 S Tejon St, Englewood, Colorado 80110
Date of Inspection: July 21-23, 2020

SIGNATURES

Lead Inspector: **CYNTHIA SCHAFER**  Digitally signed by CYNTHIA SCHAFER
Date: 2020.09.10 15:57:33 -06'00'

RCRA Branch Chief: **Janice Pearson**  Digitally signed by Janice Pearson
Date: 2020.09.10 16:21:27 -06'00'

APPENDICES AND ATTACHMENT

Appendix A: Sampling Data

Appendix B: Photo Log

Attachment 1: Valves Missing from Subpart BB Monitoring Plan

Facility Name: Safety-Kleen Systems Inc. - Englewood
Facility Location: 2801 S Tejon St, Englewood, Colorado 80110
Date of Inspection: July 21-23, 2020

APPENDIX A: SAMPLING DATA

Table 1. Summary of Analytical Results for Volatile Organic Compounds (mg/kg¹)^{2,3} Safety-Kleen Systems, Inc. - Region 8 Englewood, Colorado				
Compound	SK01A⁴	SK01B⁵	SK02	SK03
Acetone	<91 ⁶	<100	<98	<99
Benzene	<91	<100	<98	<99
Bromodichloromethane	<91	<100	<98	<99
Bromoform	<91	<100	<98	<99
2-Butanone (MEK)	<91	<100	<98	<99
Carbon disulfide	<91	<100	<98	<99
Carbon tetrachloride	<91	<100	<98	<99
Chlorobenzene	<91	<100	<98	<99
Chloroform	<91	<100	<98	<99
1,2-Dichlorobenzene	<91	<100	<98	<99
Dibromochloromethane	<91	<100	<98	<99
1,2-Dibromo-3-chloropropane	<91	<100	<98	<99
1,2-Dibromoethane	<91	<100	<98	<99
1,3-Dichlorobenzene	<91	<100	<98	<99
1,4-Dichlorobenzene	<91	<100	<98	<99
1,1-Dichloroethane	<91	<100	<98	<99
1,2-Dichloroethane	<91	<100	<98	<99
1,1-Dichloroethene	<91	<100	<98	<99
cis-1,2-Dichloroethene	<91	<100	<98	<99
trans-1,2-Dichloroethene	<91	<100	<98	<99
1,2-Dichloropropane	<91	<100	<98	<99
cis-1,3-Dichloropropene	<91	<100	<98	<99
trans-1,3-Dichloropropene	<91	<100	<98	<99
Ethylbenzene	<91	<100	<98	<99
Hexachlorobutadiene	<91	<100	<98	<99
Hexane	<91	<100	<98	<99
2-Hexanone	<91	<100	<98	<99
Isobutylbenzene	<91	<100	<98	<99
Isopropylbenzene	<91	<100	<98	<99
Methylene chloride	<91	<100	<98	<99
4-Methyl-2-pentanone (MIBK)	<91	<100	<98	<99
Naphthalene	<91	<100	<98	<99
n-Propylbenzene	<91	<100	<98	<99

Facility Name: Safety-Kleen Systems Inc. - Englewood

Facility Location: 2801 S Tejon St, Englewood, Colorado 80110

Date of Inspection: July 21-23, 2020

Table 1. Summary of Analytical Results for Volatile Organic Compounds (mg/kg¹)^{2,3}

**Safety-Kleen Systems, Inc. - Region 8
Englewood, Colorado**

Compound	SK01A⁴	SK01B⁵	SK02	SK03
Styrene	<91	<100	<98	<99
1,1,2,2-Tetrachloroethane	<91	<100	<98	<99
Tetrachloroethene	<91	<100	<98	<99
Tetrahydrofuran	<91	<100	<98	<99
Toluene	<91	<100	<98	<99
1,2,3-Trichlorobenzene	<91	<100	<98	<99
1,2,4-Trichlorobenzene	<91	<100	<98	<99
1,1,1-Trichloroethane	<91	<100	<98	<99
1,1,2-Trichloroethane	<91	<100	<98	<99
Trichloroethene	<91	<100	<98	<99
1,2,4-Trimethylbenzene	<91	<100	111 ⁷	114 ⁷
1,3,5-Trimethylbenzene	<91	<100	<98	<99
m- &/or p-Xylene	<91	<100	<98	<99
o-Xylene	<91	<100	<98	<99

¹ mg/kg = milligram per kilogram.

² SW-846 Methods 5030B, 5035, and 8260D were performed on each sample.

³ Measurement uncertainty was estimated to $\pm 46\%$.

⁴ C. Lutz determined sample numbers.

⁵ Sample Nos SK01A and SK01B were sampled in duplicate.

⁶ Compound not detected above the minimum reporting limit (MRL).

⁷ Reported average, n=2.

Facility Name: Safety-Kleen Systems Inc. - Englewood
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APPENDIX B: PHOTO LOG

Attributes	
Title	Photo 1
Subject	Safety-Kleen Englewood
Description	Hazardous waste drum for used oil samples
Date/Time	7/22/2020 9:22:35 AM
File Name	RIMG0001.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Facility Name: Safety-Kleen Systems Inc. - Englewood

Facility Location: 2801 S Tejon St, Englewood, Colorado 80110

Date of Inspection: July 21-23, 2020

Attributes	
Title	Photo 2
Subject	Safety-Kleen Englewood
Description	Loading and unloading area: left two valves connect to product tanks, right goes to waste tank. Inspection team identified a leaking component on the waste tank connection line.
Date/Time	7/22/2020 9:39:55 AM
File Name	RIMG0002.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543

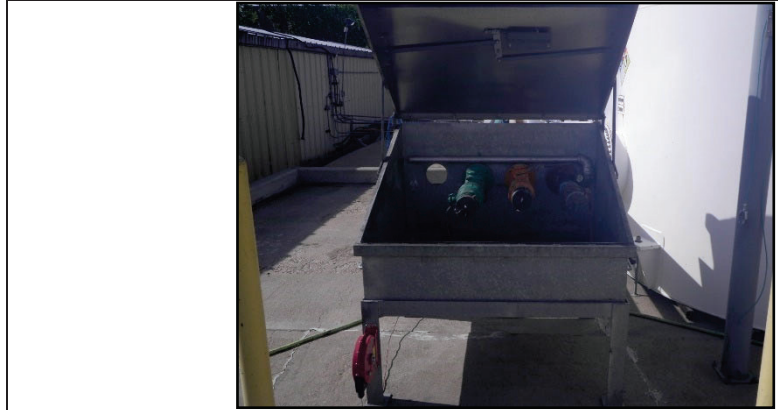


Facility Name: Safety-Kleen Systems Inc. - Englewood

Facility Location: 2801 S Tejon St, Englewood, Colorado 80110

Date of Inspection: July 21-23, 2020

Attributes	
Title	Photo 3
Subject	Safety-Kleen Englewood
Description	Loading and unloading area: left two valves connect to product tanks, right goes to waste tank. Inspection team identified a leaking component on the waste tank connection line.
Date/Time	7/22/2020 9:40:19 AM
File Name	RIMG0003.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Attributes	
Title	Photo 4
Subject	Safety-Kleen Englewood
Description	Loading and unloading area: left two valves connect to product tanks, right goes to waste tank. Inspection team identified a leaking component on the waste tank connection line.
Date/Time	7/22/2020 9:41:00 AM
File Name	RIMG0004.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Facility Name: Safety-Kleen Systems Inc. - Englewood

Facility Location: 2801 S Tejon St, Englewood, Colorado 80110

Date of Inspection: July 21-23, 2020

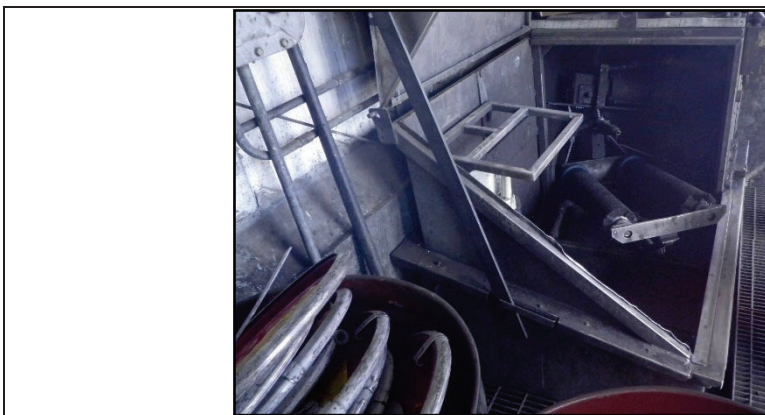
Attributes	
Title	Photo 5
Subject	Safety-Kleen Englewood
Description	Dirty solvent hazardous waste tank
Date/Time	7/22/2020 9:47:15 AM
File Name	RIMG0005.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Attributes	
Title	Photo 6
Subject	Safety-Kleen Englewood
Description	Drum spritzer
Date/Time	7/22/2020 10:18:47 AM
File Name	RIMG0006.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Attributes	
Title	Photo 7
Subject	Safety-Kleen Englewood
Description	Drum spritzer
Date/Time	7/22/2020 10:19:02 AM
File Name	RIMG0007.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543

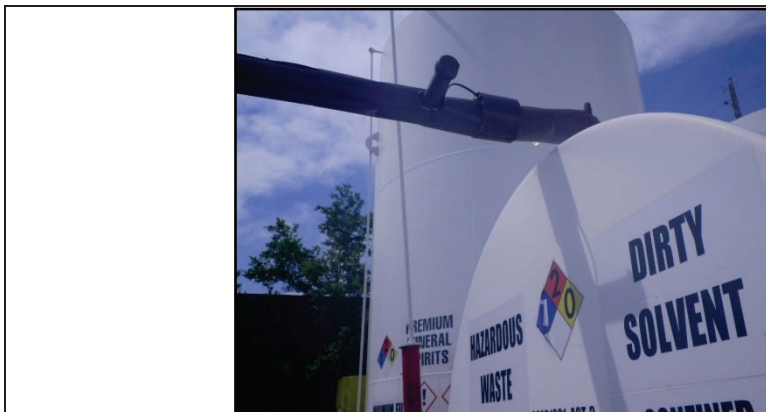


Facility Name: Safety-Kleen Systems Inc. - Englewood

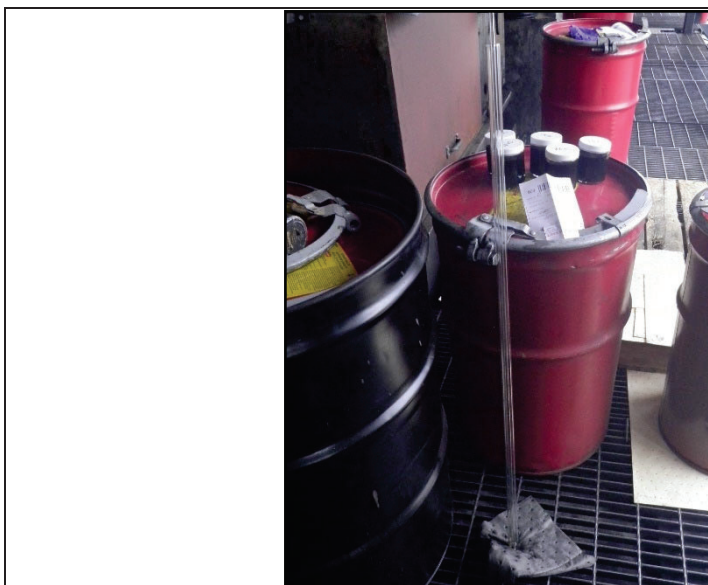
Facility Location: 2801 S Tejon St, Englewood, Colorado 80110

Date of Inspection: July 21-23, 2020

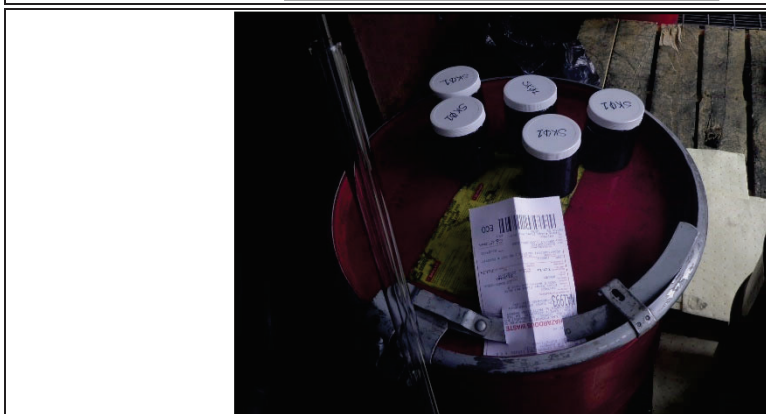
Attributes	
Title	Photo 8
Subject	Safety-Kleen Englewood
Description	Capped line on dirty solvent hazardous waste tank
Date/Time	7/22/2020 11:04:05 AM
File Name	RIMG0008.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Attributes	
Title	Photo 9
Subject	Safety-Kleen Englewood
Description	Sample SK01 overview
Date/Time	7/22/2020 4:33:50 PM
File Name	RIMG0009.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Attributes	
Title	Photo 10
Subject	Safety-Kleen Englewood
Description	Sample SK01 close-up
Date/Time	7/22/2020 4:34:05 PM
File Name	RIMG0010.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543

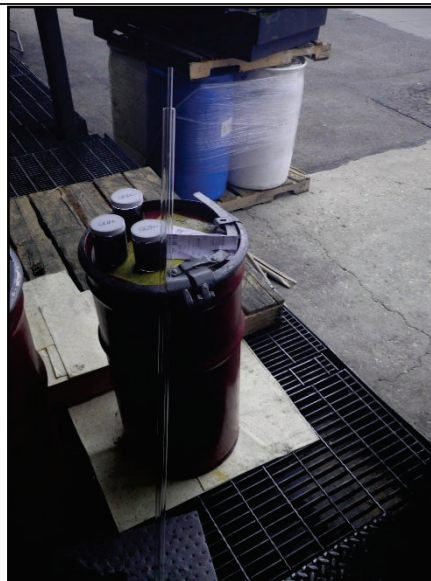


Facility Name: Safety-Kleen Systems Inc. - Englewood

Facility Location: 2801 S Tejon St, Englewood, Colorado 80110

Date of Inspection: July 21-23, 2020

Attributes	
Title	Photo 11
Subject	Safety-Kleen Englewood
Description	Sample SK02 overview
Date/Time	7/22/2020 4:41:51 PM
File Name	RIMG0011.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Attributes	
Title	Photo 12
Subject	Safety-Kleen Englewood
Description	Sample SK02 close-up
Date/Time	7/22/2020 4:42:00 PM
File Name	RIMG0012.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Facility Name: Safety-Kleen Systems Inc. - Englewood

Facility Location: 2801 S Tejon St, Englewood, Colorado 80110

Date of Inspection: July 21-23, 2020

Attributes	
Title	Photo 13
Subject	Safety-Kleen Englewood
Description	Sample SK03 overview
Date/Time	7/22/2020 4:46:53 PM
File Name	RIMG0013.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Attributes	
Title	Photo 14
Subject	Safety-Kleen Englewood
Description	Sample SK03 close-up
Date/Time	7/22/2020 4:47:02 PM
File Name	RIMG0014.JPG
Photographer	Laura Kanopkin
Make/Model	Ricoh G700SE
Equipment ID	S83543



Facility Name: Safety-Kleen Systems Inc. - Englewood
Facility Location: 2801 S Tejon St, Englewood, Colorado 80110
Date of Inspection: July 21-23, 2020

ATTACHMENT 1: VALVE MISSING FROM SUBPART BB MONITORING PLAN

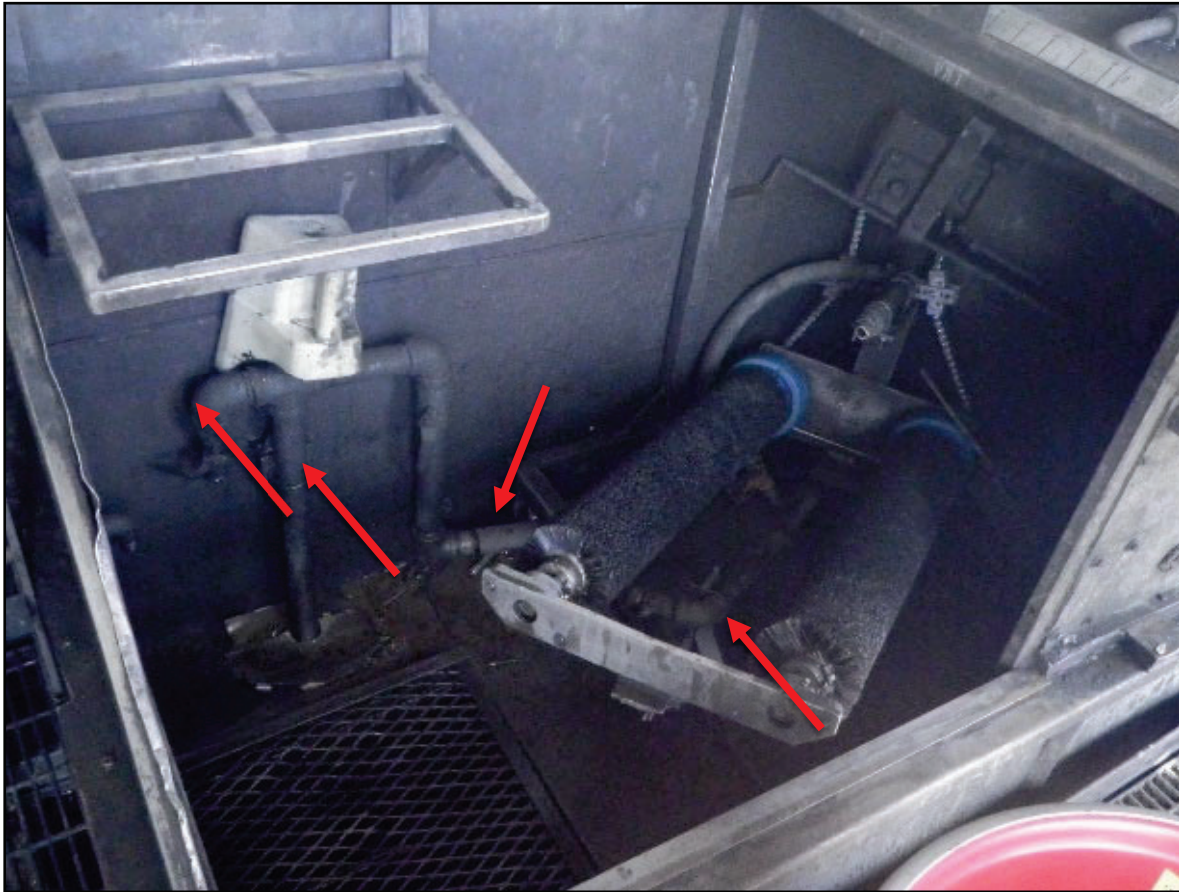


Figure 1: Inside the north return and fill station at the Safety-Kleen Englewood facility. Arrows point to valves that are in heavy liquid service and should be included in the Subpart BB monitoring plan. The south return and fill station is **identical and has the same valves missing** from the Subpart BB monitoring plan.

Facility Name: Safety-Kleen Systems Inc. - Englewood
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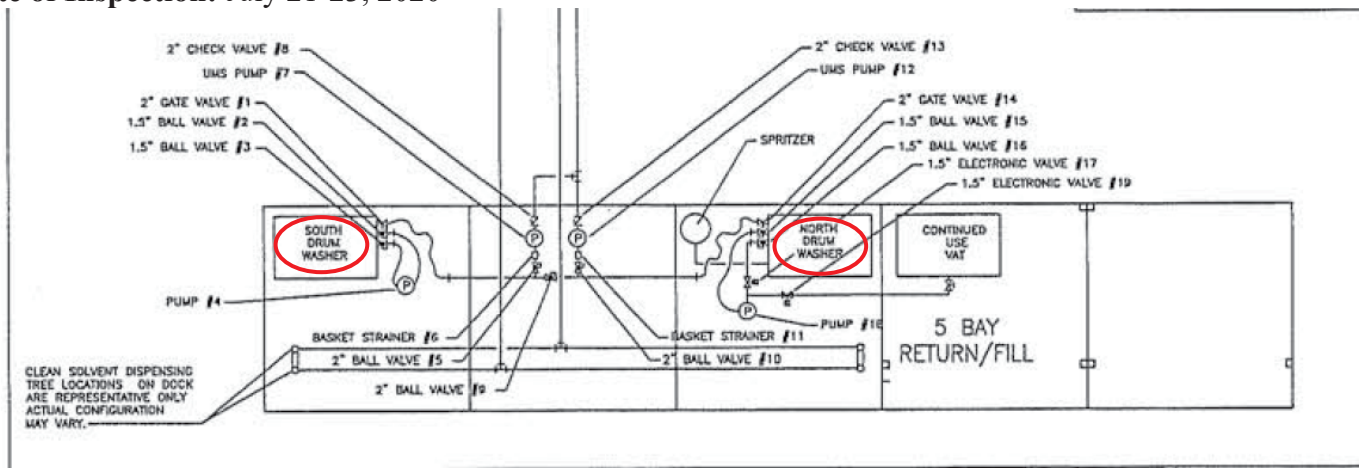


Figure 2: Snippet of the Subpart BB monitoring plan from the Safety-Kleen Englewood RCRA permit, Attachment 3 which shows the locations of the valves included on the Subpart BB monitoring plan. The red ovals indicate the general location of the valves missing from the Subpart BB monitoring plan.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

BASIC INFORMATION

Facility Name: Shoshone and Arapaho Tribal Transit Center (Facility) **Facility Location:** 1114 17-Mile Road, Arapahoe, Wyoming 82510
RCRA ID: XHW100000002

Notification Status: VSQG **Facility Contact:** Howard Brown, Transportation Director
Date of Inspection: August 18, 2021 **Arrival Time:** 1:05 p.m.
Departure Time: 2:45 p.m.

Lead Inspector: Cindy Schafer, Environmental Engineer

Other Attendees:

1. Annette Maxwell, Physical Scientist, U.S. EPA Region 8
2. Steve Babits, Northern Arapaho Natural Resource Office
3. Tim Payne, Office Manager, Tribal Transit Center
4. Franklin Pogue, Asset Manager, Tribal Transit Center

Type and Purpose of Inspection: Compliance Assistance Visit
Compliance with RCRA used oil and spent lead acid battery regulations

Facility Type: Road Construction Vehicle Maintenance Facility and Equipment Storage

Applicable Regulations to Inspection: 40 C.F.R. § 279.20-24 (Standards for Used Oil Generators) and 40 C.F.R. § 273.10-20 (Standards for Small Quantity Handlers of Universal Waste)

Inspection Type: Unannounced Inspection
EPA Inspection

OPENING CONFERENCE

- | | |
|--|--|
| ☒ Credentials Presented | ☒ CBI warning to facility provided |
| ☒ Small Business Assistance Worksheet provided to facility contact | ☐ CBI was provided or discussed during the inspection |

The following information was verbally obtained from Tim Payne or Franklyn Pogue during the inspection unless otherwise noted.

General Facility and Process Description: The Facility is a maintenance and storage facility for road construction vehicles. Maintenance activities include oil changes, battery replacement, and other general maintenance activities.

Facility Name: Shoshone and Arapaho Tribal Transit Center

Facility Location: 1114 17-Mile Road, Arapahoe, Wyoming 82510

Date of Inspection: August 18, 2021

Staff Interview: Tim Payne showed us the waste collection area. He said that many of the containers in the waste collection area were from the prior location at the Roads Garage facility (49 Norkok St., Fort Washakie, Wyoming) that was recently closed down. Most of the equipment and supplies were transferred to the Tribal Transit Center. They are still working to identify the contents in many of the containers.

Franklin Pogue showed us the vacuum truck that they use to vacuum up used oil from equipment and store in one of the containers on the truck. He said that all of the used oil containers at the Facility were picked up from Road Garage; normally they only store used oil in the vacuum truck. The used oil is transported in the truck to Bailey's Oil Company; this facility's authorization to collect and burn used oil from off-site generators, including determination of on-specification status of the used oil under 40 CFR 279.11, was not evaluated during this inspection.

TOUR INFORMATION

Areas of the facility I toured:

- Waste storage area
- Outside of garage
- Northwest side of the Facility
- Garage

Observations:

- There were 15 containers, each with secondary containment, that had suspected used oil in the waste collection area and most were not labeled.
- There was a tote that was not labeled outside the secondary containment area with remnants of what appeared to be used oil inside of it, otherwise the tote was empty.
- The used oil tank was labeled and appeared to be empty.
- There were two containers behind the used oil tote and tank, one was labeled trans-hydraulic fluid and the other was labeled litholine Plus EP 2 Grease. Tim Payne did not think the labels were accurate and that the containers contained waste.
- Six containers, each was a 55-gallon drum, were located on the east side of the garage; none were labeled and they were in poor condition with rust and dents visible. There was no evidence of any leaks. Tim Payne did not know what the contents of the drums were. The containers were not within secondary containment.
- A smaller container located next to the six containers was labeled antifreeze, but it looked like used oil had spilled out of it.
- Two containers, each was a five-gallon bucket, were located on the southwest corner of the garage, and they looked like they contained used oil and appeared to be leaking with oil running off the concrete pad and onto the ground.
- The labels on the vacuum truck for the used oil tank were located on top of the tank, I had to climb up on top of the truck to see the labels.
- Containers (55-gallon drums) located on the northwest side of the Facility. Franklin Pogue said that they are a mix of used and unused oil. One was labeled "Used Oil" and the other drums were not labeled.
- I did not observe any used oil containers or spent lead acid batteries inside the garage.

Facility Name: Shoshone and Arapaho Tribal Transit Center
Facility Location: 1114 17-Mile Road, Arapahoe, Wyoming 82510
Date of Inspection: August 18, 2021
CLOSING CONFERENCE

Compliance Assistance: We provided the Small Business Assistance worksheet Franklin Pogue. We informed Franklin Pogue that all used oil containers need to be labeled "Used Oil" in some way. Some facilities apply labels to the used oil containers while others write "Used Oil" directly on the containers. Both methods for labeling meet the requirement to label the containers.

We also explained that if the Facility does not know what type of waste is in a container; for example, a container from the Roads Garage facility, then they will likely need to sample and analyze the contents of the containers to determine whether they contain hazardous waste.

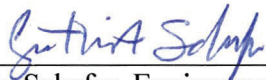
Deficiencies or Concerns: There were unlabeled containers in the Waste Collection area, on the east side of the garage, on the southwest side of the garage, and the northwest side of the Facility. These containers need to be labeled with the contents of the containers. Used oil containers must contain the label "Used Oil". Hazardous waste containers, if present, must contain the label "Hazardous Waste" and an indication of the hazard. e.g., flammable, corrosive, toxic, etc.

There were liquids in secondary containment for the waste collection area.

INSPECTION FOLLOW-UP

Concerns or Deficiencies for Future Follow-Up: Unlabeled containers in the Waste Collection area, on the east side of the garage, on the southwest side of the garage, and the northwest side of the Facility need to have their contents identified and the containers labeled.

SIGNATURE

Lead Inspector:  Date: 10/26/2021
Cindy Schafer, Environmental Engineer

JANICE PEARSON Digitally signed by JANICE PEARSON
Date: 2021.10.21 16:15:34 -06'00'

Supervisor: _____ Date: _____
Janice Pearson, Branch Chief
RCRA/OPA Enforcement Branch

APPENDICES AND ATTACHMENTS

Appendix A: Photo Log

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

Appendix A: Photo Log

Attributes		
Title	Photo 1	
Subject	Tribal Transit Center	
Description	Overview of the waste collection area.	
Date/Time	August 18, 2021 at 13:31	
File Name	DSCN1533.jpg	
Photographer	Cindy Schafer	
Make/Model	Nikon Cool Pix S7000	
Equipment ID	B00227	
Attributes		
Title	Photo 2	
Subject	Tribal Transit Center	
Description	Inside the secondary containment for the waste collection area. This is the secondary containment on the right in Photo 1.	
Date/Time	August 18, 2021 at 13:39	
File Name	DSCN1534.jpg	
Photographer	Cindy Schafer	
Make/Model	Nikon Cool Pix S7000	
Equipment ID	B00227	
Attributes		
Title	Photo 3	
Subject	Tribal Transit Center	
Description	Inside the secondary containment for the waste collection area. This is the secondary containment on the right in Photo 1.	
Date/Time	August 18, 2021 at 13:40	
File Name	DSCN1535.jpg	
Photographer	Cindy Schafer	
Make/Model	Nikon Cool Pix S7000	
Equipment ID	B00227	

Facility Name: Shoshone and Arapaho Tribal Transit Center

Facility Location: 1114 17-Mile Road, Arapahoe, Wyoming 82510

Date of Inspection: August 18, 2021

Attributes	
Title	Photo 4
Subject	Tribal Transit Center
Description	Inside the secondary containment for the waste collection area. This is the secondary containment on the left in Photo 1.
Date/Time	August 18, 2021 at 13:42
File Name	DSCN1536.jpg
Photographer	Cindy Schafer
Make/Model	Nikon Cool Pix S7000
Equipment ID	B00227



Attributes	
Title	Photo 5
Subject	Tribal Transit Center
Description	Overview of containers on east side of the garage.
Date/Time	August 18, 2021 at 13:46
File Name	DSCN1537.jpg
Photographer	Cindy Schafer
Make/Model	Nikon Cool Pix S7000
Equipment ID	B00227



Attributes	
Title	Photo 6
Subject	Tribal Transit Center
Description	Damaged container on east side of the garage. The container is located behind the row of containers in Photo 5.
Date/Time	August 18, 2021 at 13:46
File Name	DSCN1538.jpg
Photographer	Cindy Schafer
Make/Model	Nikon Cool Pix S7000
Equipment ID	B00227



Facility Name: Shoshone and Arapaho Tribal Transit Center

Facility Location: 1114 17-Mile Road, Arapahoe, Wyoming 82510

Date of Inspection: August 18, 2021

Attributes		
Title	Photo 7	
Subject	Tribal Transit Center	
Description	Overview of five-gallon containers on southwest corner of the garage.	
Date/Time	August 18, 2021 at 13:50	
File Name	DSCN1539.jpg	
Photographer	Cindy Schafer	
Make/Model	Nikon Cool Pix S7000	
Equipment ID	B00227	
Attributes		
Title	Photo 8	
Subject	Tribal Transit Center	
Description	Stained concrete and contaminated soil from contents of containers in Photo 7, which is likely used oil.	
Date/Time	August 18, 2021 at 13:50	
File Name	DSCN1540.jpg	
Photographer	Cindy Schafer	
Make/Model	Nikon Cool Pix S7000	
Equipment ID	B00227	
Attributes		
Title	Photo 9	
Subject	Tribal Transit Center	
Description	Label on vacuum truck for used oil tank.	
Date/Time	August 18, 2021 at 13:58	
File Name	DSCN1541.jpg	
Photographer	Cindy Schafer	
Make/Model	Nikon Cool Pix S7000	
Equipment ID	B00227	

Facility Name: Shoshone and Arapaho Tribal Transit Center

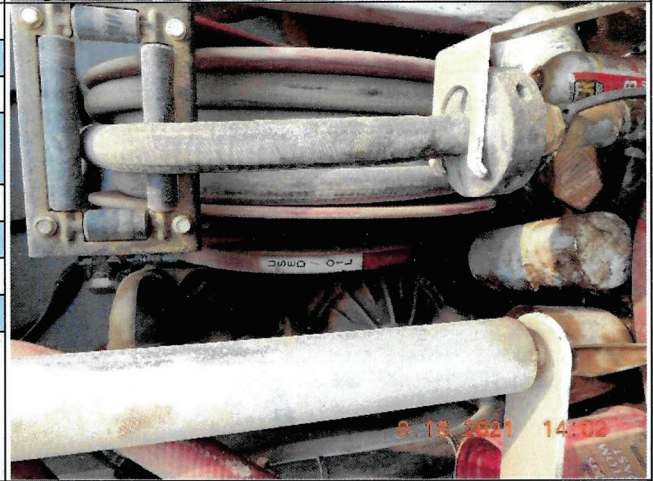
Facility Location: 1114 17-Mile Road, Arapahoe, Wyoming 82510

Date of Inspection: August 18, 2021

Attributes	
Title	Photo 10
Subject	Tribal Transit Center
Description	Another label on vacuum for used oil tank.
Date/Time	August 18, 2021 at 13:58
File Name	DSCN1542.jpg
Photographer	Cindy Schafer
Make/Model	Nikon Cool Pix S7000
Equipment ID	B00227



Attributes	
Title	Photo 11
Subject	Tribal Transit Center
Description	Label on hose for used oil tank on the vacuum truck.
Date/Time	August 18, 2021 at 14:02
File Name	DSCN1543.jpg
Photographer	Cindy Schafer
Make/Model	Nikon Cool Pix S7000
Equipment ID	B00227



Attributes	
Title	Photo 12
Subject	Tribal Transit Center
Description	Overview of containers on the northwest side of the Facility.
Date/Time	August 18, 2021 at 14:13
File Name	DSCN1544.jpg
Photographer	Cindy Schafer
Make/Model	Nikon Cool Pix S7000
Equipment ID	B00227



Facility Name: Shoshone and Arapaho Tribal Transit Center

Facility Location: 1114 17-Mile Road, Arapahoe, Wyoming 82510

Date of Inspection: August 18, 2021

Attributes	
Title	Photo 13
Subject	Tribal Transit Center
Description	Contaminated soil from the contents of one of the drums in Photo 12.
Date/Time	August 18, 2021 at 14:14
File Name	DSCN1445.jpg
Photographer	Cindy Schafer
Make/Model	Nikon Cool Pix S7000
Equipment ID	B00227



Attributes	
Title	Photo 14
Subject	Tribal Transit Center
Description	Another container near the containers in Photo 12 with the label "Rock Drill ISO 100".
Date/Time	August 18, 2021 at 14:16
File Name	DSCN1546.jpg
Photographer	Cindy Schafer
Make/Model	Nikon Cool Pix S7000
Equipment ID	B00227

