

RCRA Inspection Report

1) Inspectors and Authors of Report

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2) Facility Information

Tradebe Treatment and Recycling of Tennessee, LLC
1004 Idlewilde Boulevard
Columbia, South Carolina 29201
Richland County
EPA ID No. SCR000778779

3) Responsible Officials

J. Craig Mooneyham
Regional Operations Manager

Phone: (803) 467-6630
Email: keith.munns@gmail.com

Kris Fournier
Vice President of Technical Services

Phone: (603) 431-2420
Email: Kris.Fournier@tradebe.com

4) Inspection Participants

J. Craig Mooneyham, Tradebe Treatment and Recycling of Tennessee, LLC
Jonas Hughes, Tradebe Treatment and Recycling of Tennessee, LLC
Jordon Willett, Tradebe Treatment and Recycling of Tennessee, LLC
Tom Richmond, South Carolina Department of Health and Environmental Control
William Kappler, U. S. Environmental Protection Agency, Region 4

5) Date of Inspection

June 16, 2022

6) Applicable Regulations

South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 et seq.,
[Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code—Annotated
U.S.C.A. 6925 and 6927)], and South Carolina Hazardous Waste Management Regulations
(SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279 [40 Code of

Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279].

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.124, 264-267, and 270, and S.C. Code Ann. Regs. 61-79.262.16(b) or R.61-79.262.17(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 25 S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15 (a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Sections 44-56-60(a)(2) and (b) of the S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.124, 264-267, and 270, provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to determine Tradebe Treatment and Recycling of Tennessee, LLC, (hereinafter, "Tradebe" or the "facility") compliance with the applicable requirements of RCRA and the corresponding South Carolina Department of Health and Environmental Control (SCDHEC) regulations. This was an EPA lead inspection.

8) Previous Inspection History

Tradebe has never previously been inspected by the SCDHEC for compliance with the federal and the State of South Carolina hazardous waste regulations.

Tradebe has never previously been inspected by the EPA for compliance with the federal and the State of South Carolina hazardous waste regulations.

9) Facility Description

Tradebe is located at 1004 Idlewilde Boulevard, Columbia, Richland County, South Carolina. The facility has been operating at this location since 2008. The facility is located on 2 acres of

property and the property is privately owned by Mr. Steve Littlejohn. The facility employs approximately 7 people and operates Monday through Friday from 7:00 a.m. to 5:00 p.m. The facility consists of one building that includes the warehouse and administrative offices. The City of Columbia provides water and sanitary sewer services. The primary NAICS code for the facility is 484230 Specialized Freight Trucking and 562112 Hazardous Waste Collection.

Tradebe submitted a notification of its regulated waste activity to SCDHEC on February 27, 2015, notifying as a very small quantity generator of hazardous waste (VSQG), a large quantity handler of universal waste (LQHUW), and a transporter and transfer facility.

Tradebe is a full-service environmental company, conducting hazardous waste identification, waste profiling, transportation, and manifesting services. Hazardous waste and non-hazardous waste containers are received at the facility in Tradebe's box truck and in trailers from other transporters. The containers are then transferred to individual trailers parked at the warehouse's loading docks. The containers are then managed in trailers for 10-days or less prior to transporting the trailers to the Tradebe Millington, Tennessee facility or the Tradebe East Chicago, Indiana facility. Tradebe transports about five trailers per week. Mr. Mooneyham indicated a trailer can store approximately 60 55-gallon containers. The transportation process includes signing the manifest, completing a container log on the hazardous and non-hazardous waste containers received and placarding the trailer, before transporting.

Damaged containers are overpacked and the customer is notified for rejection, returned to the generator, or transported to the destination facility for processing. Mr. Mooneyham indicated the facility responds to a release or spill from a container of waste by overpacking the impacted container with the waste generated from the release or spill for shipment to the destination facility.

Tradebe does not conduct general facility maintenance and does not conduct vehicle maintenance operations. Mr. Mooneyham indicated hazardous waste is not generated from the facility's operations.

10) Opening Conference

On June 16, 2022, EPA inspector William Kappler, accompanied by SCDHEC inspector Tom Richmond, arrived at Tradebe at approximately 8:30 a.m. The inspectors were escorted to a conference room by Ms. Naijeavah Jarrett and Mr. Jordon Willett, the Southeast Account Manager for Tradebe, joined the inspectors in the conference room for an opening conference. The inspectors were later joined in the conference room by Mr. J. Craig Mooneyham, Regional Operations Manager and Mr. Jonas Hughs, Operations Manager. The inspectors introduced themselves, presented their credentials and explained the purpose of the visit. The EPA inspector described the anticipated use of a digital camera during the inspection, and 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. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. The EPA's information sheet for small businesses, can be found at

During the opening conference, facility representatives provided an overview of the facility's history and current operations. The inspection participants also discussed health and safety protocols and the required personal protective equipment, prior to Mr. Mooneyham and Mr. Hughes leading the inspectors on a tour of the facility operations.

11) **Findings**

Warehouse

The Warehouse consists of several loading docks, a chemical product storage area, assorted transportation equipment, tools, spill control equipment, personnel protection equipment (PPE), and overpack containers. Communication is conducted by cell phone.

The inspectors observed four 55-gallon containers accumulating non-hazardous waste formalin and tissue samples. The containers were closed and labeled with the words "non-hazardous waste" (Photograph 1). The inspectors also observed two 35-gallon containers accumulating dimethyl ammonium chloride. The containers were accumulating on the loading dock, until shipment, because of the possible incompatibility with hazardous waste accumulating in the trailers (Photograph 2).

A.R. Paquette Trailer #292914

The inspectors observed approximately 35 to 40 containers ranging from 35-gallons to 55-gallons and approximately six one-cubic yard wooden boxes accumulating hazardous waste and non-hazardous waste. The containers were accumulating based on the facility's receipt from the transporter and the first container(s) into the trailer. The inspectors, based on the containers that were observed, were closed, appeared in good condition, labeled with the words hazardous waste, labeled with hazard indicators, and marked with an accumulation start date. The facility should provide as much available aisle space, as possible, to inspect and respond to a release or spill from a container (Photographs 3 and 4).

Maumee Express, Inc. (MXI) Trailer #5224

The inspectors observed approximately 47 containers ranging from 35-gallons to 55-gallons accumulating hazardous waste and non-hazardous waste. The containers were accumulating based on the facility's receipt from the transporter and the first container(s) into the trailer. The inspectors, based on the containers that were observed, were closed, appeared in good condition, labeled with the words hazardous waste, labeled with hazard indicators, and marked with an accumulation start date. The facility should provide as much available aisle space, as possible, to inspect and respond to a release or spill from a container (Photograph 5). The inspectors observed three containers accumulating waste near the back of the trailer. The facility separated the containers, because of the possible incompatibility with the other containers of hazardous waste on the trailer. The inspectors also observed next to the containers, a spill of a possible corrosive liquid on the floor of the trailer. The facility was in the process of responding to the spill by neutralizing it and conducting a waste determination (Photograph 6).

Tradebe Box Truck #674233

The inspectors observed approximately 36 55-gallon containers accumulating hazardous waste

and non-hazardous waste in the box truck. The inspectors observed the containers were closed, in good condition, labeled with the words hazardous waste, labeled with hazard indicators, and marked with an accumulation start date (Photograph 7).

Storage Yard-Outdoor Trailers

The inspectors walked the perimeter of the storage yard and observed two trailers. The inspectors observed the trailers were empty.

Waste Management

Tradebe indicated hazardous waste is not generated at the facility. The facility operates a 10-day transfer facility. Universal waste was not observed accumulating at the facility.

The inspector reviewed the RCRA Subtitle C Site Identification Form, 8700-12, dated February 27, 2015, submitted to SCDHEC. The facility notified as managing D001-D043, F001-F012, F019-F028, F032, F034, F035, F037, F038, and K, P, and U listed hazardous waste.

Tradebe used the following transporters in 2020 to 2022

Maumee Express, Inc.–NJD986667386

A.R. Paquette & Co, Inc.–FLD982105884

Tradebe Transportation, LLC–INR000123497

Advanced Environmental Options, Inc–SCR000074575

Tradebe used the following TSDFs in 2020 to 2022

Tradebe Transportation, LLC–TNR000020230

Record Review

Several records were reviewed onsite, but additional records were requested to be submitted electronically from the facility to the inspector. The records were emailed to the inspector on June 17, 2022. The records included:

- RCRA Subtitle C site identification form
- 10-day transfer facility log (template)
- 10-day transfer facility log–January to June 2022
- Hazardous waste training certificates and training records
- Facility contingency plan
- Certificate of liability insurance

The hazardous waste manifests and land disposal restriction notifications were randomly reviewed at the facility from 2019 to 2022.

A hard-copy of the 10-day transfer facility logs were reviewed at the facility for May and June 2022. The log includes entries for the: transporter/trailer number, start date (date first container received), date in; generator name, city, and state of pick up; transporter in/trailer or box number, sales order number, manifest document number, manifest container count (each container size), actual drum space, date out, destination facility, and receiver initials. The inspectors observed

several logs were missing entries in the “start date” and “date out” columns. The full printed name of the person (receiver) of the log should be entered.

The 10-day transfer facility template and the 10-day transfer facility logs from January 2022 to June 2022, were received electronically and were reviewed. The log includes entries for the: date in (received); generator name, city and state of pick up; transporter in/trailer or box number, sales order number, manifest document number, manifest container count (container size in gallons, tote, cubic yard box, or pallet), actual drum space, transporter out/trailer or box number, start date (same as date in), date out, destination facility, receiver initials, date due out of 10-day, and days of storage. The inspectors observed some of the logs were missing entries for the year the 10-day period began, in the “date in” column, and missing entries for the total days in storage, in the “days of storage” column. The full printed name of the person (receiver) of the log should be entered.

Pursuant to S.C. Code Ann. Regs. 61-79.263.12(a) [40 C.F.R. § 263.12(a)], a transporter who stores manifested shipments of hazardous waste in containers meeting the independent requirements of S.C. Code Ann. Regs. 61-79.262.30 [40 C.F.R. § 262.30] of this chapter at a transfer facility for a period of ten (10) days or less is not subject to regulation under parts S.C. Code Ann. Regs. 61-79.264, 265, 267, 268, and 270 [264, 265, 267, 268, and 270] of this chapter with respect to the storage of those wastes.

The inspectors reviewed the contingency plan (Plan) at the facility, and it was electronically submitted. The Plan was revised on May 1, 2018. The Plan lists Jonas Hughes, Craig Mooneyham and Kris Fournier as the emergency coordinators and their contact phone numbers. The Plan describes emergency actions, a list of the emergency response agencies (local authorities), a list of emergency equipment, follow-up procedures and a training program.

Tradebe should develop a quick reference guide (QRG) in accordance with S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)].

The hazardous waste training given to employees managing hazardous waste, the job titles and position descriptions was electronically submitted and were reviewed for Fletcher Hornsby, James Lindley, J. Craig Mooneyham, Jonas Hughes, Keel William, Maria Staley, Naijeavah Jarrett, and Trevor Jensen.

The certificate of liability insurance for 2022 was electronically submitted and reviewed.

12) Closing Conference

Upon conclusion of the inspection, a closing conference was conducted in the presence of Mr. J. Craig Mooneyham and Mr. Jonas Hughes. The inspectors informed the facility of the preliminary conclusions based on the areas inspected. The inspectors provided recommendations and requested the facility electronically submit the additional RCRA records for review.

13) Inspection Findings

Tradebe was inspected as a very small quantity generator of hazardous waste, a large quantity

handler of universal waste (LQHUW) and a transporter and transfer facility. Based on the observations during the inspection, Tradebe was apparently deficient with the following RCRA requirements:

Pursuant to S.C. Code Ann. Regs. 61-79.263.12(a) [40 C.F.R. § 263.12(a)], a transporter who stores manifested shipments of hazardous waste in containers meeting the independent requirements of S.C. Code Ann. Regs. 61-79.262.30 [40 C.F.R. § 262.30] of this chapter at a transfer facility for a period of ten (10) days or less is not subject to regulation under parts S.C. Code Ann. Regs. 61-79.264, 265, 267, 268, and 270 [264, 265, 267, 268, and 270] of this chapter with respect to the storage of those wastes.

Additional Observations

Tradebe should manage the generation of waste from its response to a spill or release or from the clean-up of a spill or release at their facility as the generator of that waste. An accurate waste determination must be conducted.

Tradebe should maintain a log for each calendar month documenting its VSQG rate.

Pursuant to S.C. Code Ann. Regs. 61-79.262.13 [40 C.F.R. § 262.13], Tradebe must determine its generator category for each calendar month in accordance with S.C. Code Ann. Regs. 61-79.262.13(a) or (b) [40 C.F.R. § 262.13(a) or (b)].

14) List of Appendices

Appendix 1–Photograph Log:
Photos taken on: June 16, 2022
Photos taken by: William Kappler
Samsung Camera (Model WB250F)
EPA Property Tag# S75917

15) Signed

WILLIAM KAPPLER

Digitally signed by WILLIAM KAPPLER
Date: 2022.07.15 14:37:01 -04'00'

William Kappler
Physical Scientist

Date

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ
Date: 2022.07.15 15:25:10 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Appendix 1–Tradebe Treatment and Recycling of Tennessee, LLC
RCRA CEI Photographs
William Kappler, US EPA



Warehouse. The inspector observed four 55-gallon containers accumulating non-hazardous waste formalin and tissue samples. The containers were closed and labeled with the words “non-hazardous waste”. Photograph 1 taken at 11:38 a.m.



Warehouse. The inspector observed two 35-gallon containers accumulating non-hazardous waste dimethyl amonium chloride. The containers were accumulating on the loading dock, until shipment because of the possible incompatibility with other waste. Photograph 2 taken at 11:38 a.m.



Warehouse. A.R. Paquette Trailer #292914. The inspector observed approximately 35 to 40 containers ranging from 35-gallons to 55-gallons and approximately six one-cubic yard wooden boxes accumulating hazardous waste and non-hazardous waste. Photograph 3 taken at 11:47 a.m.



Warehouse. A.R. Paquette Trailer #292914. The inspector observed approximately 35 to 40 containers ranging from 35-gallons to 55-gallons and approximately six one-cubic yard wooden boxes accumulating hazardous waste and non-hazardous waste. Photograph 4 taken at 11:47 a.m.

Appendix 1–Tradebe Treatment and Recycling of Tennessee, LLC
RCRA CEI Photographs
William Kappler, US EPA



Warehouse. Maumee Express, Inc. (MXI) Trailer #5224. The inspector observed approximately 47 containers ranging from 35-gallons to 55-gallons accumulating hazardous waste and non-hazardous waste. Photograph 5 taken at 11:49 a.m.



Warehouse. Maumee Express, Inc. (MXI) Trailer #5224. The inspector observed three containers accumulating hazardous waste near the back of the trailer. The inspector also observed a spill of a possible corrosive liquid on the floor of the trailer. The facility was in the process of responding to the spill by neutralizing it and conducting a waste determination. Photograph 6 taken at 11:49 a.m.



Warehouse. Tradebe Box Truck #674233. The inspector observed approximately 36 55-gallon containers accumulating hazardous waste and non-hazardous waste in the box truck. Photograph 7 taken at 11:57 a.m.