



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
WRR Environmental Services, Eau Claire, WI

FROM: Jason Schenandoah, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: WRR Environmental Services (WRR)

Facility Location: 5200 Ryder Road, Eau Claire, WI 54701

Date of Inspection: May 2, 2023

EPA Inspector(s):

1. Jason Schenandoah, Environmental Engineer
2. Brittany Cobb, Environmental Engineer

Other Attendees:

1. Mark Gasser, Mechanical Engineer, WRR
2. Preston Gingras, Compliance Assistant, WRR
3. Jim Hager, President, WRR
4. Jake Center, Chemical Engineer, WRR
5. Becky Anderson, Director of Compliance, WRR

Contact Email Address: andersrl@WRRES.com

Purpose of Inspection: Leak Detection and Repair (LDAR) comparative monitoring

Facility Type: Waste recycling and management facility

Regulations Central to Inspection: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks at 40 C.F.R. Part 63, Subpart H

Facility Name: WRR Environmental Services
Facility Location: 5200 Ryder Road, Eau Claire, WI 54701
Date of Inspection: May 2, 2023

Arrival Time: 8:00 am
Departure Time: 3:45 pm

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from WRR Personnel unless otherwise noted.

Process Description:

WRR's facility processes hazardous waste in solvent recovery, solvent recycling, and fuel blending processes and maintains storage operations. Wastes are received by the facility in one of the several truck loadout areas and, after acceptance, are pumped and stored in one of the hazardous waste storage tanks, or sludge tanks. Solvents are recovered from the wastes in thin film evaporation units and solvent distillation columns. Recovered solvent is stored in the facility's product tanks, which will unload recycled solvents into trucks for shipping. The facility also receives wastes that are not suitable for solvent recovery. Many of these wastes are blended into waste fuels for use in cement kilns. Waste blending involves mixing wastes of different energy contents, into a mixture with suitable properties for use as fuel.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA Method 21 (Method 21) measurements were conducted via 1 Toxic Vapor Analyzer (TVA) 2020. Method 21 was conducted in the following facility process areas: F-3*, F-2, R-2, R-4, E-23, E-4, LMS, Delta-T, E-1, E-2, E-1 sludge dike, E-2 sludge dike, and product dike.

Background measurements of volatile organic compounds (VOC) inside of the process unit building ranged up to 25 parts per million (ppm). A collection container was stored near the R-1 and Delta-T process units. The collection container had a lidded funnel on top it; there was no gasket associated with the funnel lid. One leak was observed at process unit E-23 with tag number E23-198. While inspectors were still onsite, the leak was repaired, and a subsequent Method 21 measurement was taken. A visual leak was detected on a connector in the Delta-T

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process unit; there was a repair tag already on the connector because it was detected by WRR personnel prior to the observation.

*The process was not operating at the time of measurement

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were taken during this inspection.

Method 21 monitoring observations have been tabulated in Appendix A: Field Measurement Data.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

DIGITAL SIGNATURES

Report Author: JASON
SCHENANDOAH

Digitally signed by JASON
SCHENANDOAH
Date: 2023.06.22
15:45:56 -05'00'

Section Supervisor: Frank,
Nathan

Digitally signed by Frank,
Nathan
Date: 2023.06.28
13:19:07 -05'00'

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APPENDICES AND ATTACHMENTS

- 1.* Appendix A: Field Measurement Data

APPENDIX A: FIELD MEASUREMENT DATA

5/2/2023 Calibration TVA #B37055

Calibration Gas Hydrocarbon Concentration (ppmv)	TVA 2020 Results (ppm)	
	Initial Calibration 8:00 am	Drift Check 12:25 pm
550	552	554
2,000	1,960	2,012
10,000	10,000	9,900

- A total of 603 components were monitored throughout the facility.

Leaks Identified

Equipment Identifier	Measurement (ppm)	Notes
E23-198	1,350	Measurement confirmed by WRR personnel; After the component was repaired a measurement of 190 ppm was made by inspectors
Collection container near R-1 and Delta-T	7,400	