

RCRA Inspection Report

1) **Inspector and Author of the Report**

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2) **Facility Information**

Safety-Kleen Systems Inc.
5217 Augusta Road, Highway 21
Garden City, Georgia 31408
EPA ID # GAD000776781

3) **Responsible Official**

Jason Groza, Safety-Kleen Systems Inc.
Carl Williams, Senior Environmental Compliance Manager

4) **Inspection Participants**

Jason Groza, Branch Manager
Keith Gordon, Lead-Material Handler
Dillon Long, GAEPD
Raj Aiyar, US EPA

5) **Date and Time of Inspection**

August 26, 2021, 9:00 a.m.

6) **Applicable Regulations**

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, adopts and incorporates by reference 40 CFR Parts 260 - 266, 268, 270, 273 & 279. The Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-60, et seq. as amended (Act), Chapter 391-3-11 of the Georgia Rules for Hazardous Waste Management (Rules), and those portions of 40 CFR Parts 260-270, 273, and 279 that are adopted into the Rules by reference).

Pursuant to the provisions of the Georgia Hazardous Waste Management Act and the Rules, Chapter 391-3-11, (as amended through October 9, 2015), adopted pursuant to that Act, a Hazardous Waste Permit, Permit No. HW-075(S&CA)-2, was issued on September 28, 2016, to Safety-Kleen Systems, Inc., and Romine Enterprises, L.P. for the Garden City, Georgia facility located at 5217 Augusta Road, Garden City, Georgia 31408 (the RCRA Permit). The RCRA Permit is issued for storage in one 10,000-gallon aboveground tank; storage of hazardous waste in three (3) hazardous waste container storage units with a total combined capacity of 5,534 gallons and investigation of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) and corrective actions to remediate releases of hazardous constituents at SWMUs.

On May 1, 2018, the RCRA Permit was modified to reflect the change in ownership of the property on which Safety-Kleen Systems Inc., Garden City facility operates. The new owners of the property are Ashley Rental Properties, LLC since Romine Enterprises, L.P. sold the property to Ashley Rental Properties, LLC. The Permittee must comply with all the terms and conditions of the RCRA Permit issued on September 28, 2016. The Permit is effective the Issued Date and shall remain in effect for ten (10) years until September 28, 2026, unless subject to revocation, suspension, modification, or amendment pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

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.

7) Purpose of Inspection

The purpose of the inspection was to conduct an announced RCRA compliance evaluation inspection (CEI) due to Covid-19 at the Safety-Kleen Systems Inc., Garden City facility and determine the facility’s compliance status with applicable RCRA regulations, corresponding GAEPD regulations and Hazardous Waste Facility Permit # HW-075(S&CA)-2. This was an EPA lead inspection.

8) Previous Inspection/Compliance History

The facility was previously inspected by the EPA and GAEPD on March 6, 2012 and September 18, 2019. One deficiency of RCRA was discovered during the inspection for failure to meet satellite accumulation area (SAA) container requirements which included failure to close, label a drum in the SAA with the words “Hazardous Waste” and an indication of the hazard of the contents. The violations were corrected during the inspection.

9) Facility Description

Safety-Kleen Systems Inc., Garden City (herein after Safety-Kleen or the facility) operates a commercial hazardous waste management facility offering solvent collection and reclamation services to customers who are primarily engaged in automotive repair, industrial maintenance, and dry-cleaning activities. The facility is located at 5217 August Road, Garden City, Chatham County, Georgia. The facility has been in operation since 1972. The facility is comprised of an office building, three permitted container storage areas, tank farm, 10-day transfer storage area, solvent return and fill station, and satellite accumulation area (SAA). Safety-Kleen currently has seven employees and operates one shift five days a week. Garden City supplies the potable water and provides domestic waste service. The service area covered by Safety-Kleen includes south and mid-west Georgia to southern parts of South Carolina.

The facility operates as a large quantity generator (LQG) of hazardous waste, a permitted hazardous waste storage and as a less than 10-day hazardous waste transfer facility.

The permitted hazardous waste units consist of the main container storage warehouse and a hazardous waste tank farm. The hazardous wastes accepted and generated by Safety-Kleen include spent parts washer solvent, spent immersion cleaner, paint booth filters, dry cleaning waste, spent gasoline filters and tank bottom sediments.

The Container Storage Area No. 1 inside the warehouse storage area is permitted for 2,304 gallons of D001, D004-D011, D007, D018, D019, D021-D030, D032-D043, and F002 hazardous waste. The Container Storage Area No. 2 in the outside flammable waste shed is permitted for 1,190 gallons of D001, D004-D011, D007, D018, D019, D021-D030, D032-D043, F002, F003, and F005 hazardous waste. The Container Storage Area No. 3 in the flammable waste shed also located inside the warehouse storage area is permitted for 2,040 gallons of D001, D004-D011, D007, D018, D019, D021-D030, D032-D043, F002, F003, and F005 hazardous waste. The Return and Fill Area is permitted as a miscellaneous hazardous waste unit containing 748 gallons per day of part washer hazardous waste with waste codes D001, D004-D011, D018, D019, D021 thru D030, D032 thru D043, and F002 thru F005.

Tank No. 1 in the tank farm is a 10,000-gallon hazardous waste tank with secondary containment used for storing spent parts washer solvent (D001, D004-D011, D018, D019, D021, D030, and D032-D043). The facility also has a 10,000-gallon double-walled tank used for storing petroleum naphtha product (clean solvent).

10) Opening Conference

On August 26, 2021, EPA Inspector, Raj Aiyar accompanied by GAEPD Inspector Dillon Long arrived at Safety-Kleen facility at approximately 9:00 am. Upon arriving at the facility, the

inspectors met and presented their credentials to Mr. Jason Groza, Branch General Manager and Keith Gordon, Lead Materials Handler personnel. Mr. Carl Williams, Senior Environmental Compliance Manager, Safety-Kleen joined us over the phone. The inspectors then explained the purpose of the visit and discussed the scope of the inspection which included health and safety protocols, use of camera for the purpose of inspection, areas to be covered during the inspection and the list of records to be reviewed as part of recordkeeping. Mr. Groza and Mr. Williams provided the inspectors the facility's history and current operation onsite. Mr. Carl Williams and Mr. Groza said that they would join us after the inspection to discuss the findings of the inspection as part of the closing conference. The inspectors were later accompanied by Mr. Gordon during the walk-through inspection of the facility.

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. Therefore, the EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

11) Findings

Container Storage (Main) Warehouse

The inspection began in the Container Storage Area No. 3. This area is located inside the warehouse (Picture-1). There were 6 35-gallon drums of solvent sludge and 2 55-gallon drums of solvent sludge and a 5-gallon drum containing spill kits inside the storage area at the time of inspection, which did not exceed the permitted capacity of 2,040 gallons of hazardous waste (Picture-2). The drums were observed to be closed, labeled, and dated. The hazard indication on the containers were observed to be "Combustible Liquid". The earliest accumulation start date was observed to be 1/21/2021. "No Smoking" signs were posted on the sides, as well as on the door of the Container Storage Area No. 3.

The Container Storage Area No. 1 was inspected next. Nonflammable permitted wastes are stored in this area (Picture-3). This area is permitted for the storage of 2,304 gallons of hazardous waste (Picture-4). At the time of inspection, the inspectors observed the following:

- 3 55-gallon drums of non-hazardous aqueous cleaning compounds, soaps, and oils
- a 30-gallon drum of non-hazardous aqueous cleaning compounds, soaps, and oils
- a 55-gallon drum of non-hazardous grease solids
- a 55-gallon drum of non-hazardous barium and chromium-contaminated grease (below TCLP)
- an 85-gallon drum of non-hazardous oil, fuel, and absorbents
- 2 30-gallon drums of non-hazardous oil and absorbents
- a 1-cubic yard tote of non-hazardous barium and chromium-contaminated grease

All the nonhazardous containers were observed to be closed, labeled and on pallets. The container storage warehouse was observed to be equipped with a fire extinguisher, spill kit and an eye wash station that are tested and inspected on a regular basis.

Container Storage Area No. 2

The area is primarily designated for storage of permitted flammable hazardous waste. This storage area was not in use at the time of inspection.

10-day Transfer Storage Area

There was no waste stored in the transfer storage area at the time of inspection.

Return and Fill Station (Solvent Return Receptable)

The parts washer solvents are transported in covered containers to the Safety-Kleen from the customers. There are two stations located at the Return and Fill Station for processing the drums when they are returned to Safety-Kleen. According to Mr. Gordon only one return and fill unit was being used for processing hazardous waste. When the spent solvent is received from the customer, it is transferred to the return and fill unit. There is a tray located in the bottom of the sump that collects sludge and the debris. The tray is periodically emptied when it gets full, by placing the hazardous waste (D001, D006, D008, D018, D039, and D040) in a 55-gallon container in the SAA located near the point of generation at the Return and Fill Station. The spent parts washer solvent from the Return and Fill Station is pumped into a permitted 10,000-gallon hazardous waste storage tank in the Tank Farm. The spent solvent is later picked up by a bulk tanker truck and sent to a permitted facility's recycling center which upon arrival delivers a clean parts washer solvent.

The operating return and fill unit was not in service at the time of inspection. There were no leaks or spills observed in the secondary containment of the Return and Fill Station. The inspectors observed that the tray containing sludge and debris (D001, D006, D008, D018, D039, and D040) had not been removed from the unit (Picture-5). The inspectors observed hazardous waste liquid (D001, D006, D008, D018, D039, and D040) in the sump (Picture-6). A drum was observed in the SAA in the Return and Fill Station closed, labeled, and had a hazard indication (Picture-7). According to Mr. Gordon the pump does not drain the sump in its entirety by pumping the spent hazardous waste solvent into the permitted hazardous waste tank. The Return and Fill Station was equipped with a spill kit and an eye wash station. "No Smoking" signs are posted in several locations at the Return and Fill Station.

The inspectors observed a zero-discharge storm drain containing liquid located outside the Safety-Kleen property. The inspectors observed a pump near the drain connected to approximately a one-inch diameter pipe discharging into a stream behind the Safety-Kleen Property (Pictures-8, 9, and 10). The pump was not in service at the time of inspection. According to the Safety-Kleen personnel, the pump was operated during a rain event to pump the stormwater to the stream after testing. However, this could not be confirmed during the records review portion of the inspection.

Tank Farm

Next, the Tank Farm was inspected. The Tank Farm consists of two 10,000-gallon aboveground storage tanks, one of which is a horizontal mount permitted storage tank for storing hazardous waste spent solvent (D001, D004, D011, D018, D019, D021, D030, and D032-D043) with a

secondary containment. Tank No.1 is labeled with the words “Hazardous Waste” “Waste Petroleum Naptha” and a “No Smoking” sign (Picture-11). There were no leaks or spills observed in the secondary containment for the hazardous waste tank (Picture-12). The base of the tank appeared to be chipped. (Picture-13).

The inspectors observed signs of rust and paint peeling on the ancillary equipment associated with the tank and the tank system (Pictures-14 and 15). The inspectors observed a tray containing unknown residual material connected with the ancillary equipment associated with the tank (Picture-16). According to Mr. Gordon, the tray was used to capture rainwater.

In response to an inquiry regarding testing frequency of the high-level alarm system, Mr. Gordon stated that the high-level alarm system on the hazardous waste tank was not in service (Pictures-17 and 18). Mr. Gordon discovered the problem with the alarm gauge on August 17, 2021 during the daily inspection of the tank and the tank system. The repair on the tank alarm was scheduled for September 3, 2021. On November 2, 2021, Mr. Williams provided a copy of the invoice by email indicating the service call and the repair of the alarm gauge sensor.

According to Mr. Groza, the spent solvent tank contains heavy liquid with low vapor pressure, therefore, a release would be visible in a liquid phase before it would be detectable as a vapor. Hence, the ancillary equipments are tagged and visually inspected and not subject to Leak Detection and Repair (LDAR) monitoring requirements. The inspectors observed various tags for the ancillary equipment including valves, pumps, and flanges associated with the tank and the tank system appeared to be weathered, missing and in the ground (Pictures-19, 20, 21, and 22). The Permit and the Permit Application require that all ancillary equipment associated with the tank and the tank systems are tagged and that the tags are always clear and visible.

The adjoining tank is a vertical mount tank also in secondary containment; however, according to Mr. Gordon, the tank has never been in service (Picture-23). The inspectors observed that the ancillary equipment associated with the vertical mount tank appeared to be disconnected. The inspectors observed a third tank outside the secondary containment. Mr. Gordon stated that the tank was double-walled and was used for storing clean solvent (product). The tank was labelled with the words “Clean 150 Mineral Spirits 150” and a “No Smoking” sign (Picture-24). “No Smoking” signs are posted in several locations around the tank farm, including the chain link fence that surrounds the facility.

Used Oil Storage

The inspectors observed 8 275-gallon bins of used oil filters and 3 165-gallon containers of used oil (Picture-25). Inspectors observed the used oil containers to be closed and labeled as “Used Oil”. There were no leaks or spills observed near the containers.

Universal Waste

There was no universal waste in storage at the time of inspection.

Records Review

The records review included the following:

- Hazardous Waste Manifests for inbound and outbound shipments for 2019, 2020
- Contingency Plan and Quick Reference Guide
- Correspondence indicating arrangement with local authorities
- Personnel Training
- Weekly Inspection Logs - Container Storage Area (Main), Flammable Storage Shed, 2019, 2020
- Inspection Logs for Tank Storage System- 2019, 2020
- Hazardous Waste Permit

RCRA Permit

Safety-Kleen maintains the RCRA permit onsite at the facility.

Manifests

Inspectors reviewed hazardous waste manifests from 2019 to 2020. The manifests included signed copies from the designated facility and land disposal notification.

Contingency Plan (Plan) and Quick Reference Guide

The facility maintains a written contingency plan. A copy of the Plan provided to the inspectors appeared to be revised in December 2015. The inspectors were not sure whether the Plan had been updated since 2015. The Plan appeared to include names of the Facility emergency coordinator and alternate coordinator, emergency notifications, evacuation procedures, spill response, emergency equipment locations and description and uses of emergency equipment. The Plan did not include any documentation showing the agreement with the local police department, fire department, other emergency response team, contractors, equipment suppliers and local hospitals. The Plan also did not appear to include an evacuation plan.

The Plan did not appear to include a Quick Reference Guide for their facility. According to Mr. Williams, in an email dated November 2, 2021, stated that Safety-Kleen was an existing LQG which has already developed a contingency plan and since there was no amendments made to the Plan since May 17, 2017, when the Generator Improvement Rule regulations went into effect, Safety-Kleen did not prepare a Quick Reference Guide.

RCRA Permitted Tank Inspection Records

Safety-Kleen maintains the records in hard copy and electronic form. Inspectors reviewed the inspection records for the permitted tanks for 2019 to 2020. There appears to be only one log for all three tanks. Although daily inspections logs are maintained, however, the logs for the tanks are not delineated separately.

A review of the inspection logs appears to indicate that tank and the tank system inspections are performed daily; however, these inspections did not identify problems which includes not identifying the rust, corrosion, and cracks observed around the tank system and containment area during the inspection and the corrective actions taken to repair it. The facility's formal external inspection conducted on 09/16/2020 for Tank No. 1 by Clean Harbors Inspection Services also appeared to indicate that the cracks in the containment should be cleaned and sealed. The other recommendation made in the report included areas with coating failure should be cleaned,

properly prepped and re-coated, ponding of water in the containment and surface rust at top manway.

RCRA Permitted Container Inspection Records

Inspectors reviewed the weekly container inspection records from 2019 to 2020 for the container storage area No. 1 and No. 3 (Main). Since storage area No. 2 was not in service at the time of inspection, no records were reviewed. There were no deficiencies observed during the review of the weekly inspection logs.

10-day Transfer Storage Area

There was no waste stored in the storage at the time of inspection. No records were reviewed.

Personnel Training

Inspectors reviewed the annual training records, job titles and job descriptions for 2019 and 2020. The personnel training records appeared to be complete.

11) Closing Conference

An exit briefing was conducted at the conclusion of the inspection. During the exit briefing, the observations made during the inspection were discussed with Mr. Groza, Mr. William and Mr. Gordon and the inspection was concluded.

12) Signed

Raj Aiyar
Environmental Engineer

Date

13) Concurrence

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Attachment A

SAFETY KLEEN SYSTEMS INC

Garden City, GA 31408

EPA ID # GAD000776781

August 26, 2021

(Photos taken by Dillon Long with GAEPD)



Picture 1: Signage at Flammable Container Storage Area #3 (Main)



Picture-4: Signages showing Permitted Storage Capacity, No Smoking and Corrosive



Picture 2: 8 Hazardous Waste Containers inside Flammable Container Storage Area #3 (Main)



Picture 5: Hazardous Waste Sludge and Debris in the Tray, Return and Fill Area (D001, D006, D008, D018, D039 and D040)



Picture 6: Hazardous Waste Liquid (D001, D006, D008, D018, D039 and D040) in the Waste Sump of the Return and Fill Unit when not in service



Picture 7: 55-gallon SAA Drum in the Return and Fill Station



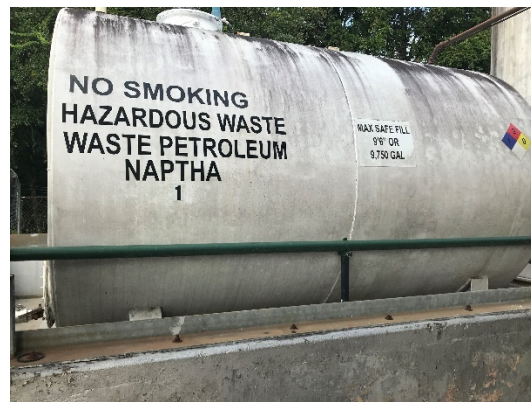
Picture 8: A pump not in service used for pumping the storm water runoff from the tank farm and return and fill unit into an unnamed tributary of a creek.



Picture 9: A pipe connected to a pump for discharging storm water containing hazardous waste to an unnamed tributary of a creek



Picture 10: Unnamed Creek located behind the SKS facility where storm water runoff from the SKS Tank Farm and Return and Fill Unit runoff is discharged via pump and a pipe.



Picture 11: 10,000-gallon Hazardous Waste Tank #1



Picture 12: No Leaks and Spills in Secondary Containment of Hazardous Waste Tank #1



Picture 13: The base of the 10,000-gallon hazardous waste tank is chipped.



Picture 16: Unknown Residual Waste in a tray in Secondary Containment of Hazardous Waste Tank #1



Picture 14: Sign of Rust and Paint Peeling in Ancillary Equipment associated with Hazardous Waste Tank #1



Picture 17: High Level Tank Alarm was not in service for Hazardous Waste Tank #1 at the time of inspection



Picture 15: Sign of Rust and Paint Peeling in Ancillary Equipment associated with Hazardous Waste Tank #1



Picture 18: High Level Tank Alarm Switch was disconnected for Hazardous Waste Tank #1



Picture 19: Tags associated with the Ancillary Equipment were not clear and visible



Picture 20: Tags associated with the Ancillary Equipment were not clear and visible and Signs of Paint peeling (Tank #1)



Picture 22: Tags associated with the Ancillary Equipment observed in the ground and rusted ancillary piping associated (Tank #1)



Picture 23: Empty Vertical Mounted Tank in Secondary Containment no longer in service (Tank #2)



Picture 24: Double walled, 10,000-gallon Clean Solvent Tank



Picture 25: Used Oil Container