



REGION 5

CHICAGO, IL 60604

**ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED**

Ms. Kimberly Peterson
Environmental Director
Reworld Hodgkins
6037 Lenzi Ave
Hodgkins, Illinois 60525
kpeterson@reworldwaste.com

Re: **Notice of Violation(s)**
Reworld Hodgkins
Facility ID: ILD064418353
Hodgkins, Illinois

Dear Ms. Peterson:

On August 14, 2024, the U.S. Environmental Protection Agency conducted a RCRA compliance evaluation inspection of the Reworld Hodgkins ("facility or you") located in Hodgkins, Illinois. The purpose of the inspection was to evaluate Reworld Hodgkins's compliance with Reworld Hodgkins's RCRA permit as well as certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your convenience.

Information currently available to EPA suggests that Reworld Hodgkins is in violation of RCRA. By this letter, EPA is extending to you an opportunity to advise the Agency, in person or in writing, of any further information EPA should consider with respect to the violations. We request that you voluntarily submit a response in writing to us no later than 30 calendar days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to address the violations identified below or demonstrating why the violation(s) have not occurred. At this time, EPA does not plan additional enforcement action under RCRA in response to the violations identified in this letter assuming Reworld Hodgkins demonstrates full compliance. EPA, however, reserves its right to take additional actions under RCRA including issuing an information request, seeking a penalty, and issuing an order.

Storage of Hazardous Waste without a Permit or Interim Status Which Violated Section 3005 of RCRA, 42 U.S.C. § 6925(a) and State Permitting Requirements

During the inspection, EPA observed Reworld Hodgkins' failure to comply with their RCRA permit conditions, below. When a permittee of a treatment, storage, and disposal facility of hazardous waste fails to comply with their permit conditions, this constitutes a violation of 35 Ill. Adm. Code 702.141 [40 CFR § 270.30(a)] and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

1. Date When Each Period of Accumulation Begins

Under Ill. Admin. Code tit. 35 § 722.134(a)(2), a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins. At the time of the inspection, three (3) drums were missing the required date. Please see photos R0010161- R0010163 of the enclosed inspection report.

In their inspection response dated September 13, 2024, Reworld Hodgkins stated they marked the required date on the containers after the inspection and referenced attached photos; however, no photos of those containers were attached.

2. Hazardous Waste Tank Labeling

Under Ill. Admin. Code tit. 35 § 722.134(a)(3), a treatment, storage, and disposal facility of hazardous waste must label or clearly mark each tank holding hazardous waste with the words "Hazardous Waste." At the time of the inspection, one (1) tank was missing the required label.

During the inspection, Reworld Hodgkins labeled the tank and provided a photo in their inspection response dated September 13, 2024, which addressed the items described above. EPA is not requesting any further information for this violation.

3. Container Condition

Under Ill. Admin. Code tit. 35 § 724.271, if a container holding hazardous waste is not in good condition, the owner or operator of a treatment, storage, and disposal facility of hazardous waste owner or operator must transfer the hazardous waste from this container to a container that is in good condition. At the time of the inspection, one (1) container in the 90-day container storage area storing hazardous waste was not in good condition.

In their inspection response dated September 13, 2024, Reworld Hodgkins stated this was corrected on the day of the inspection and referenced attached photos; however, no photos of this container were attached.

4. Aisle Space

Under, Ill. Admin. Code tit. 35 § 724.135, the owner or operator of a treatment, storage, and disposal facility of hazardous waste must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. At the time of the inspection, there was no aisle space between totes containing hazardous waste in the 90-day container storage area.

In their inspection response dated September 13, 2024, Reworld Hodgkins provided a photo that showed the container storage area remarked as to where totes may be stored to prevent any future issues with aisle spacing, which addressed the items described above. EPA is not requesting any further information for this violation.

5. Contingency Plan

Under, Ill. Admin. Code tit. 35 § 724.152(d), a treatment, storage, and disposal facility of hazardous waste must have a contingency plan that lists the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, and this list must be kept up to date. Upon review of the contingency plan, it did not contain an updated list of persons qualified to act as emergency coordinator.

6. Training

Under, Ill. Admin. Code tit. 35 § 724.116(a)(1), a treatment, storage, and disposal facility of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. With respect to this training program, a treatment, storage, and disposal facility must maintain the following documents and records at its facility for employees filling a position related to hazardous waste management: the job title for each position at the facility and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given; and records that document that the training or job experience described above has been given to and completed by facility personnel. At the time of the inspection, Reworld Hodgkins did not have documentation regarding training given to and completed by facility personnel "D. Kaftan."

Actions Requested

In order to ensure compliance, by no later than 30 calendar days after receipt of this letter, please provide information documenting the actions, if any, which you have taken since the inspection to address the identified violations or demonstrating why the violation(s) have not occurred. You do not need to provide documentation regarding violations that you addressed during the inspection as noted above.

Please send all reports requested by this letter by electronic mail to:

r5lecab@epa.gov

and

brown.jaime.l@epa.gov

The subject line of all email correspondence must include your EPA identification number, ILD064418353. All electronically submitted materials must be in final and searchable format, such as Portable Document Format (PDF) with Optical Character Recognition (OCR) applied. If you are unable to send a response to these email addresses due to email size restrictions or other problems, contact Jaime L. Brown to make additional arrangements for transmission of the response.

This letter is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks information from specific individuals or entities as part of an administrative investigation. You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to EPA in response to this letter. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

The EPA contact in this matter is Jaime L. Brown. You may call her at (312) 886-3781 if you have additional questions. Thank you for your prompt attention to these concerns and your efforts to protect human health and the environment.

Sincerely,

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Enclosure

cc: Nolin Moon, Illinois Environmental Protection Agency (IEPA), nolin.moon@illinois.gov
Chris Cahnovsky, IEPA, chris.cahnovsky@illinois.gov