

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	June 26 – 29, 2023	
Media Program:	RCRA	
Regulatory Program(s)	Large Quantity Generator	
Company Name:		
Facility Name:	Quala Rail and Specialty	
Facility Physical Location:	5100 Underwood Road	
(City, State, Zip Code)	Pasadena, Texas 77507	
Mailing address:	5100 Underwood Road	
(City, State, Zip Code)	Pasadena, Texas 77507	
County/Parish:	Harris County	
Facility Phone Number	832-261-6011	
Facility Contact:	Chuck Anderson	General Manager
	canderson@quala.us.com	
FRS Number:	110012182431	
Identification/Permit Number:		
Media Identifier Number:	RCRA ID: TXR000047035	
NAICS:	562998 - All Other Miscellaneous Waste Management Services	
SIC:	4789 – Transportation Services, Not Elsewhere Classified	
Personnel participating in inspection:		
John Penland	USEPA Region 6 (ECDSR)	Senior Environmental Scientist - Inspector
Dedriel Gardner	USEPA Region 6 (ECDSR)	Senior Environmental Scientist - Inspector
Chuck Anderson	Quala	General Manager
Michael Bass	Quala	Director – Environmental, Health and Safety
Courtney Durham	Quala	Environmental Manager
Donna McMillan	WCM Group	Environmental Consultant
Arthur Davis	Quala	Environmental, Health and Safety Specialist
Chuck Boyd	Quala	Vice President for Environmental Affairs
EPA Lead Inspector Signature/Date	JOHN PENLAND Digitally signed by JOHN PENLAND Date: 2023.10.10 14:23:02 -05'00'	
	John Penland – Senior Environmental Scientist (ECDSR)	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2023.10.10 13:24:19 -05'00'	
	Debra Pandak – Section Chief (ECDSR)	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of June 26, 2023, Environmental Protection Agency (EPA) Region 6 inspectors John Penland and Dedriel Gardner conducted an unannounced inspection of the QualaWash Holdings, LLC #704 - Rail and Specialty facility (Quala #704), formerly Alpha Technical Services, located at 5100 Underwood Rd. in Pasadena, Texas. The inspection was conducted to determine compliance with the Resource Conservation and Recovery Act (RCRA). The inspection included walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management. The Quala #704 facility was targeted for inspection as part of the Region 6 response to EPA's November 2022 Drum Reconditioner Damage Case Report.

FACILITY DESCRIPTION

Quala #704 is a commercial cargo tank cleaning facility which provides decontamination and washing services of bulk transportation equipment. Quala #704 cleans empty cargo tanks, such as tank trailers, tank railcars, ISO tank containers, and portable mini-bulk storage tanks (intermediate bulk containers or totes), which have previously contained products, materials, or wastes, that have been transported over public highways or by rail.

Wastes are generated primarily from the preparation of empty cargo tanks prior to washing and wastewaters from the washing process. The residual material in a tank is physically drained from the cargo tank into containers. This residue is managed as a hazardous waste if it meets either the definition of a listed hazardous waste or one of the four RCRA characteristics.

The cleaning areas include equipment to safely access cargo tanks and has a concrete floor, which drains to a wastewater collection system. All residual material in the empty cargo tank is drained into waste containers. Wash and rinse water is emptied directly to the floor drains. When necessary, solvents are used to remove certain residual materials. These solvent-generated wastes are managed in containers. Waste containers are accumulated at the two wash areas before being moved to the designated waste container accumulation area in the warehouse. Some containers of hazardous wastes are alternatively pumped to hazardous waste tank T1 for accumulation prior to shipment offsite for disposal.

Section II – INSPECTION SUMMARY

June 26, 2023

We arrived at the Quala #704 facility at approximately 9:30am Central Time and began the inspection with an opening conference. During this conference, we presented our credentials to Mr. Michael Bass and Mr. Chuck Anderson and informed them that we were there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. During this conference, we also discussed the purpose and scope of the inspection and notified them of the facility's right to assert a claim for Confidential Business Information for records collected during this inspection.

Following the opening conference, we conducted our first walkthrough of the facility's process and storage areas. This initial walkthrough was focused primarily on inspector orientation of the site, but also included a cursory evaluation of the facility's compliance with the hazardous waste container and tank management standards.

We concluded the inspection day with a discussion of the facility's status as a hazardous waste Large Quantity Generator and Transporter. The Quala #704 facility receives non-RCRA empty containers of hazardous waste. The facility is not listed as the designated facility for these shipments and is not engaged in the actual transport of these wastes. Mrs. Courtney Durham claims that the facility is allowed to manage these wastes without a RCRA Part B permit since the facility is registered as a transfer facility.

We departed the facility at approximately 2:45pm Central Time.

For our detailed observations, inspection notes, and records request, see the Daily Summary for June 26, 2023, in Appendix 2.

June 27, 2023

We arrived at the Quala #704 facility at approximately 9:30am Central Time to begin our inspection day. We began the day with a more comprehensive walkthrough of the facility focusing on each of the facility process areas. During this walkthrough, we evaluated the facility's compliance with the hazardous waste container and tank standards as well as the facility's general duty to prevent releases of hazardous waste or hazardous constituents to the environment.

Following this walkthrough, we discussed the facility's operating procedures and records management.

We concluded our inspection day at approximately 5:10pm Central Time.

For our detailed observations, inspection notes, and records request, see the Daily Summary for June 27, 2023, in Appendix 2.

June 28, 2023

We arrived at the Quala #704 facility at approximately 9:30am Central Time to begin our inspection day. Our inspection day focused on a review of the facility's compliance records. Specifically, we reviewed records related to:

- Facility inspections of hazardous waste container accumulation areas
- The Hazardous Waste Contingency Plan
- Personnel Training
- The Waste Minimization Plan
- Hazardous Waste Manifests
- Hazardous Waste Characterization

We concluded our inspection day at approximately 3:30pm Central Time.

For our detailed observations, inspection notes, and records request, see the Daily Summary for June 28, 2023, in Appendix 2.

June 29, 2023

We arrived at the Quala #704 facility at approximately 9:30am Central Time to begin our inspection day. We began the day by interviewing Mr. Mike Patterson who is responsible for maintenance activities at the facility. Our discussion focused on the maintenance history of hazardous waste tank T1.

Following this interview, we discussed our ongoing request for facility compliance records.

We ended our day with a closing conference where we presented our provisional areas of concern to the facility which are summarized in Section III of this report.

For our detailed observations, inspection notes, and records request, see the Daily Summary for June 29, 2023, in Appendix 2.

Section III – AREAS OF CONCERN

1. Open containers of hazardous waste - 40 CFR 262.17(a)(1)(iv)(A) and 40 CFR 262.15(a)(4)

The container management standards for large quantity generators require containers accumulating hazardous waste to be kept closed unless waste is actively being added or removed. During this inspection we observed 5 containers which were in hazardous waste service and open when unattended and not being filled or emptied.

- On June 26, 2023, we found one open 55-gallon drum of alkylsulfuric acid residues in the rail and specialty wash area. See photos 7 and 8.
- On June 26, 2023, we found one open 55-gallon drum of “solid heel” in the rail and specialty wash area. See photos 23, 24, and 29.
- On June 26, 2023, we found one open 275-gallon tote of liquid hazardous waste residue in the rail and specialty wash area. See photo 25.
- On June 27, 2023, we found one open 55-gallon drum of hazardous waste in the trailer wash area. See photo 41.
- On June 27, 2023, we found one open 275-gallon tote of hazardous waste in the trailer wash area. See photo 42 and 43.

Each container was immediately closed by facility personnel.

2. Unlabeled containers of hazardous waste - 40 CFR 262.17(a)(5)(i) and 40 CFR 262.15(a)(5)

The container management standards require large quantity generators to mark containers used for the accumulation of hazardous waste with: the words “hazardous waste”; an indication of the hazards associated with the waste; and, except for satellite accumulation containers, the date when accumulation of the waste began. During this inspection we observed, 18 containers which were used to accumulate hazardous waste but were not appropriately labeled.

- On June 26, 2023, we found one 55-gallon drum of hazardous waste solids from the cleaning of tanker trailers missing an accumulation start date. This container was in the hazardous waste container central accumulation area (WMU 008). See photos 1 through 5.

- On June 26, 2023, we found seven unlabeled 275-gallon totes of spent hydrochloric acid waste in the rail and specialty wash area. See photos 9, 10, 11, and 55.
- On June 26, 2023, we found one unlabeled 275-gallon tote of hazardous waste in the rail and specialty wash area. See photos 12 and 13.
- On June 26, 2023, we found two unlabeled 55-gallon drums of hazardous waste in the rail and specialty wash area. See photos 14 through 17.
- On June 26, 2023, we found two unlabeled 55-gallon drums of hazardous waste in the rail and specialty wash area. See photos 18 and 19.
- On June 26, 2023, we found one unlabeled 55-gallon drum of hazardous waste “solid heels” in the rail and specialty wash area. See photos 23, 24, and 29.
- On June 26, 2023, we found one unlabeled 275-gallon tote of hazardous waste in the rail and specialty wash area. See photo 25.
- On June 26, 2023, we found one unlabeled 275-gallon tote of hazardous waste in the rail and specialty wash area. See photo 30.
- On June 26, 2023, we found one unlabeled 275-gallon tote of hazardous waste in the rail and specialty wash area. See photo 31.
- On June 27, 2023, we found one unlabeled 55-gallon drum used for the puncture and draining of waste aerosol cans in the trailer maintenance area. See photo 35.

Each container was immediately labeled by facility personnel after identification.

3. Unlabeled container of Used Oil - 40 CFR 279.22(c)(1)

The used oil management standards require generators to label containers used for the accumulation of used oil with the words “Used Oil”. During this inspection, we observed 1 container used for the accumulation of Used Oil which was unlabeled. See photos 36 and 37.

4. Failure to inspect a hazardous waste container central accumulation area – 40 CFR 262.17(a)(1)(v)

The hazardous waste generator standards require large quantity generators to inspect central accumulation areas at least weekly. Based on the operations we observed during this inspection, the Quala is operating the rail and specialty wash area as a central accumulation area for hazardous waste containers. Quala’s Notice of Registration (NOR) filed with the TCEQ indicates that WMU 001 is used for this purpose and facility maps designate an area proximate to the rail and specialty wash area as WMU 001. However, during this inspection neither the NOR nor the facility maps reflect the actual operations we observed. Regardless of this discrepancy, the facility has been unable to provide any documentation to show that the rail and specialty wash area has been inspected. According to Courtney Durham, at the time of this inspection, only WMU 008 is inspected on a weekly basis.

5. Failure to remove accumulated liquids from the secondary containment of a hazardous waste tank - 40 CFR 262.17(a)(2)->265.193(c)(4)

The hazardous waste generator standards require large quantity generators to remove spilled or leaked waste and accumulated precipitation from the secondary containment system for hazardous waste tanks within 24 hours. On both June 26 and June 27, during this inspection, we observed accumulated liquids in the secondary containment of Tank T1 (WMU 006). See photos 27, 28, and 64.

6. Failure to construct or line the secondary containment of a hazardous waste tank with compatible or impervious materials - 40 CFR 262.17(a)(2)->265.193(c)(1)

The hazardous waste generator standards require large quantity generators to construct secondary containment systems for hazardous waste tanks using materials that are compatible with the waste contained in the tank and with the operations carried out in the unit. During this inspection, we observed extensive corrosion and pitting of the secondary containment system for Tank T1 (WMU 006). The secondary containment damage is present in the floor of the concrete liner throughout the containment area and pitting appears to extend to a depth of more than 1 inch. See photos 27, 28, and 64.

7. Failure to have procedures in place to exclude incompatible waste from Tank T1 - 40 CFR 262.17(a)(2)->265.199(a)

The hazardous waste generator standards prohibit large quantity generators from introducing incompatible wastes to a hazardous waste storage tank. At Quala #704, this appears to be implemented solely through administrative controls without routine waste sampling. We have not been provided with a written procedure that explicitly describes this exclusion process. Due to the hazardous and very often incompatible nature of the wastes managed by the facility, this process is an important feature of overall process safety management. See also 40 CFR 262.251.

8. Failure to conduct daily inspections of hazardous waste tank T1 - 40 CFR.17(a)(2)->265.195

The hazardous waste generator standards require large quantity generators to inspect hazardous waste tanks at least daily. The facility has been unable to provide any documentation to show that the hazardous waste tank T1 is being inspected daily. According to Courtney Durham at the time of this inspection, this activity has not been conducted.

9. Failure to conduct and maintain records of annual inspections for a hazardous waste tank subject to Subpart CC controls - 40 CFR 262.17(a)(2)->265.1085(c)(4) and 265.1090(b)(1)(ii)

The hazardous waste generator standards require large quantity generators to inspect at least annually hazardous waste tanks which are subject to the Level 1 control standards for air emissions. The facility has been unable to provide any documentation to show that the roof and emission controls for hazardous waste tank T1 are being inspected on an annual basis. According to Courtney Durham at the time of this inspection, this activity has not been conducted. Our assessment that the Level 1 control standard applies is based on the >500ppm VOC content of the waste and a tank volume of less than 26 m³. However, the facility has been unable to provide the appropriate documentation for this assessment (see Area of Concern 10).

10. Failure to test and maintain records of the Maximum Organic Vapor Pressure for a tank subject to Subpart CC controls - 40 CFR 262.17(a)(2)-> 265.1085 (c)(1) and 265.1090(b)(2)(i)

The hazardous waste generator standards require large quantity generators to determine the Maximum Organic Vapor Pressure of hazardous waste managed in a hazardous waste tank equipped with a fixed roof where that tank receives hazardous waste with a VOC content of greater than 500

ppmv. This test is required to ensure that the facility is using the appropriate air emissions controls for the waste tank. Quala has been unable to provide any documentation to show that the Maximum Organic Vapor Pressure test described in 40 CFR 265.1084(c) has been conducted.

11. Operation of a hazardous waste tank which is unfit for use – 40 CFR 265.196.

The hazardous waste generator standards require large quantity generators to cease the operation of a hazardous waste tank which has become unfit for use. A tank system becomes unfit for use when it is no longer capable of storing or treating hazardous waste without posing a threat of release of hazardous waste to the environment. During this inspection, we observed holes in the roof of Tank T1 estimated to be larger than 10 inches in diameter. VOC measurements from these openings, using Quala's equipment, exceeded 500ppm above background indicating that hazardous waste was being released to the air from this tank. See photos 20, 21, 22, and 49.

12. Potential offsite release of industrial waste - 30 TAC 335.4

The State of Texas requirements for generators of industrial waste prohibit management of an industrial waste in a manner which could cause the unauthorized discharge of that industrial waste to water of the state. During this inspection, we observed that sand blast media was uncontained in the sand blast area and offsite migration was observed into a drainage ditch outside of the fence line. In this same area, we observed staining of the soils with an unknown black material that also appeared to be following a release pathway from the facility into a drainage ditch. See photos 50 through 53.

13. Failure to protect flammable waste from potential ignition by electrical spark - 40 CFR 262.17(a)(1)(vi)(B) and/or 40 CFR 262.251

The hazardous waste generator standards require large quantity generators to protect hazardous waste containers from accidental release and generally operate their facility in a manner which minimizes the risk of fire or explosion. During this inspection, we observed that the facility has designated an area near high voltage electrical panels for the accumulation of flammable hazardous waste. See photos 32 and 33.

14. Management of containers of incompatible waste - 40 CFR 262.17(a)(1)(vii)(C)

The hazardous waste generator standards require large quantity generators to protect hazardous waste containers from contact with incompatible materials. The facility manages a large amount of potentially incompatible waste containers. During our inspections of WMU 005 and WMU 008, we did not see spill pallets, posted incompatible waste guidance, or any other means to prevent the comingled storage of incompatible waste containers.

15. Failure to fully characterize hazardous waste - 40 CFR 262.11

The hazardous waste generator standards require all generators to make and maintain records of an accurate waste determination for each waste to ensure wastes are properly managed according to applicable RCRA regulations. During our review of the facility's Tote Inventory records, we found several entries marked as "unknown". These "unknown" containers were subsequently added to hazardous waste tank T1.

16. Operation of a hazardous waste storage facility without a permit - 40 CFR 270.1

As part of its normal operations, the facility receives and manages manifested hazardous waste from TSDFs. While a TSDF is allowed to send non-RCRA empty containers to an alternate facility (see 40 CFR 264.72(d)), that alternate facility must be a facility which is permitted to receive that waste as a designated facility. Quala #704 is claiming that it is allowed to conduct these repackaging operations without a permit as a transfer facility using its status as a hazardous waste transporter. However, this facility does not transport these waste shipments and often does not even sign the waste manifest. Facially, these operations appear to require a Part B permit so that the Quala #704 facility could serve as an alternate designated facility for these non-RCRA empty hazardous waste container shipments. This position is reinforced in 45 FR 78924 which discusses the management of non-RCRA empty containers in the context of container cleaning operations. According to this document, the management of non-RCRA empty containers is required to be conducted at the generator's facility or a permitted or interim status facility.

Section IV – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 2 – Daily Summary of Inspection Notes and Observations

APPENDIX 1

PHOTO LOG

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo Number	File Name		Date	Time	Photographer	Description
1	DSCN1059	.JPG	26-Jun-23	1047	John Penland	55-gallon drum of hazardous waste solids from the cleaning of tanker trailers. Missing Accumulation Start Date.
2	DSCN1060	.JPG	26-Jun-23	1047	John Penland	55-gallon drum of hazardous waste solids from the cleaning of tanker trailers. Missing Accumulation Start Date.
3	DSCN1061	.JPG	26-Jun-23	1047	John Penland	55-gallon drum of hazardous waste solids from the cleaning of tanker trailers. Missing Accumulation Start Date.
4	DSCN1062	.JPG	26-Jun-23	1048	John Penland	Hazardous waste containers located on western side of the Central Accumulation Area (WMU 008). Includes drum in photos 1-3
5	DSCN1063	.JPG	26-Jun-23	1052	John Penland	Correction Photo: Drum of hazardous waste solids from the cleaning of tanker trailers. Accumulation Start Date added to lid with wax pencil.
6	DSCN1064	.JPG	26-Jun-23	1111	John Penland	Container of hydrochloric acid used for pH adjustment in the trailer wash wastewater treatment system. Container was determined to contain unused product. Operators inadvertently used a hazardous waste label on this container
7	DSCN1065	.JPG	26-Jun-23	1128	John Penland	Container of hazardous waste alkylsulfuric acid residues located at the rail and specialty wash area. Container was found open at the time of inspection.
8	DSCN1066	.JPG	26-Jun-23	1128	John Penland	Close view of label on container depicted in photo 7.

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo Number	File Name		Date	Time	Photographer	Description
9	DSCN1067	.JPG	26-Jun-23	1132	John Penland	Seven (nine total but two are empty) containers of hazardous waste claimed as spent hydrochloric acid located near the rail and specialty wash rack. Containers were found unlabeled at the time of inspection.
10	DSCN1068	.JPG	26-Jun-23	1132	John Penland	Seven (nine total but two are empty) containers of hazardous waste claimed as spent hydrochloric acid located near the rail and specialty wash rack. Containers were found unlabeled at the time of inspection.
11	DSCN1069	.JPG	26-Jun-23	1132	John Penland	Seven (nine total but two are empty) containers of hazardous waste claimed as spent hydrochloric acid located near the rail and specialty wash rack. Containers were found unlabeled at the time of inspection.
12	DSCN1070	.JPG	26-Jun-23	1133	John Penland	One container of hazardous waste located near the rail and specialty wash rack. Container was found unlabeled at the time of inspection.
13	DSCN1071	.JPG	26-Jun-23	1134	John Penland	One container (same as photo 12) of hazardous waste located near the rail and specialty wash rack. Container was found unlabeled at the time of inspection.
14	DSCN1072	.JPG	26-Jun-23	1136	John Penland	Two containers of hazardous waste residues located in rail and specialty wash area. Containers were found unlabeled at the time of inspection.

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Photo Number	File Name		Date	Time	Photographer	Description
15	DSCN1073	.JPG	26-Jun-23	1136	John Penland	Hazardous waste labels being applied to the containers depicted in photo 14.
16	DSCN1074	.JPG	26-Jun-23	1137	John Penland	Hazardous waste labels being applied to the containers depicted in photo 14.
17	DSCN1075	.JPG	26-Jun-23	1137	John Penland	Close view of label applied to containers depicted in photo 14
18	DSCN1076	.JPG	26-Jun-23	1138	John Penland	Two containers of hazardous waste residues located in rail and specialty wash area. Containers were found unlabeled at the time of inspection.
19	DSCN1077	.JPG	26-Jun-23	1138	John Penland	Close view of markings on lid of containers from photo 18.
20	DSCN1078	.JPG	26-Jun-23	1146	John Penland	Roof of hazardous waste tank T1 (NOR Unit 6). Large holes penetrate the roof. The largest hole is estimated to exceed 10 inches in diameter. The roof hatch is also open. Collapsed, out of service, fill pipe is visible on the opposite side of the roof from the tank hatch.
21	DSCN1079	.JPG	26-Jun-23	1146	John Penland	Roof of hazardous waste tank T1 (NOR Unit 6). Large holes penetrate the roof. The largest hole is estimated to exceed 10 inches in diameter. The roof hatch is also open. Collapsed, out-of-service, fill pipe is visible on the opposite side of the roof from the tank hatch.
22	DSCN1080	.JPG	26-Jun-23	1146	John Penland	Roof of hazardous waste tank T1 (NOR Unit 6). Close view of the collapsed, out of service, fill pipe.

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Photo Number	File Name		Date	Time	Photographer	Description
23	DSCN1081	.JPG	26-Jun-23	1159	John Penland	One container of hazardous waste located near the rail and specialty wash rack. Container was found open and unlabeled at the time of inspection.
24	DSCN1082	.JPG	26-Jun-23	1159	John Penland	Close view of markings on lid of container from photo 23.
25	DSCN1083	.JPG	26-Jun-23	1159	John Penland	One container of hazardous waste located near the rail and specialty wash rack. Container was found open and unlabeled at the time of inspection.
26	DSCN1084	.JPG	26-Jun-23	1201	John Penland	Close view of hazardous waste label on tank T-1.
27	DSCN1085	.JPG	26-Jun-23	1202	John Penland	View of accumulated liquids and pitting in the concrete liner which serves as secondary containment for tank T-1
28	DSCN1086	.JPG	26-Jun-23	1202	John Penland	View of accumulated liquids and pitting in the concrete liner which serves as secondary containment for tank T-1
29	DSCN1087	.JPG	26-Jun-23	1211	John Penland	Container depicted in photo 23 being closed and labeled
30	DSCN1088	.JPG	26-Jun-23	1213	John Penland	One container of hazardous waste located near the rail and specialty wash rack. Container was inadequately labeled at the time of inspection.
31	DSCN1089	.JPG	26-Jun-23	1213	John Penland	One container of hazardous waste located near the rail and specialty wash rack. Container was found unlabeled at the time of inspection.
32	DSCN1090	.JPG	27-Jun-23	1029	John Penland	Overview photo of the warehouse area which is operated as a <90-day hazardous waste container central accumulation area (NOR Unit 8).

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Photo Number	File Name		Date	Time	Photographer	Description
33	DSCN1091	.JPG	27-Jun-23	1029	John Penland	Photo of NOR Unit 8 showing proximity of high voltage electrical panels.
34	DSCN1092	.JPG	27-Jun-23	1033	John Penland	Exterior view of the tanker trailer wash bays
35	DSCN1093	.JPG	27-Jun-23	1036	John Penland	Drum used for the puncture and draining of waste aerosol cans in the trailer maintenance area. Container was found unlabeled at the time of inspection.
36	DSCN1094	.JPG	27-Jun-23	1038	John Penland	Container used for the accumulation of Used Oil in the trailer maintenance area. Container was found unlabeled at the time of inspection.
37	DSCN1095	.JPG	27-Jun-23	1038	John Penland	Container used for the accumulation of Used Oil in the trailer maintenance area. Container was found unlabeled at the time of inspection.
38	DSCN1096	.JPG	27-Jun-23	1043	John Penland	Scrap bin located behind trailer maintenance area. This container was determined to be the property of the colocated logistics company not Quala.
39	DSCN1097	.JPG	27-Jun-23	1045	John Penland	Spill caused by the forklift movement of an open waste container at the trailer wash area.
40	DSCN1098	.JPG	27-Jun-23	1046	John Penland	Open container in the trailer wash area which is the source of the spill depicted by photo 39.
41	DSCN1099	.JPG	27-Jun-23	1048	John Penland	One container used for the satellite accumulation of hazardous waste in the trailer wash area. Container was found open at the time of inspection.

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Photo Number	File Name		Date	Time	Photographer	Description
42	DSCN1100	.JPG	27-Jun-23	1049	John Penland	One container of hazardous waste in the trailer wash area. Container was found open and inadequately labeled at the time of inspection.
43	DSCN1101	.JPG	27-Jun-23	1049	John Penland	Close view of the open container depicted in photo 42.
44	DSCN1102	.JPG	27-Jun-23	1051	John Penland	Oily staining and spills around wastewater treatment tank T-2A in the trailer wash area. Spill caused by the overfilling of the wastewater tank overnight.
45	DSCN1103	.JPG	27-Jun-23	1052	John Penland	Oily staining and spills around wastewater treatment tank T-2A in the trailer wash area. Spill caused by the overfilling of the wastewater tank overnight.
46	DSCN1104	.JPG	27-Jun-23	1103	John Penland	Spill depicted in photo 39 being cleaned.
47	DSCN1105	.JPG	27-Jun-23	1111	John Penland	Operators cleaning spill in the rail and specialty wash area.
48	DSCN1106	.JPG	27-Jun-23	1113	John Penland	Stained soils present in the rail and specialty wash area.
49	DSCN1107	.JPG	27-Jun-23	1120	John Penland	Air monitoring for emissions of volatile organic compounds from the holes in the roof of tank T-1 (NOR Unit 6). Photo-ionization detector reading of 871.4ppm.
50	DSCN1108	.JPG	27-Jun-23	1129	John Penland	Photo of sandblasting area. Note: Used sandblast media covers the ground throughout this area.
51	DSCN1109	.JPG	27-Jun-23	1130	John Penland	Sandblast media escaping the concrete lined sandblast area. Silt fencing is used in an effort to prevent offsite migration of the used media.
52	DSCN1110	.JPG	27-Jun-23	1131	John Penland	Fenceline detail on northern side of sandblast area.

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Photo Number	File Name		Date	Time	Photographer	Description
53	DSCN1111	.JPG	27-Jun-23	1132	John Penland	Soil staining and visible indications of offsite release of material through an erosion pathway on west side of sandblast area.
54	DSCN1112	.JPG	27-Jun-23	1159	John Penland	Close view of label on container of hazardous waste. Note: generator identified as Huntsman but the waste was actually generated by Quala's container washing activities.
55	DSCN1113	.JPG	27-Jun-23	1204	John Penland	Containers depicted in photos 9 through 11 after labels applied.
56	DSCN1114	.JPG	27-Jun-23	1204	John Penland	Close view of label used on containers previously depicted in photo 55. Label erroneously describes the material as anhydrous ammonia.
57	DSCN1115	.JPG	27-Jun-23	1205	John Penland	One container determined to be product HC located in area also used for the management of the containers depicted in photo 55.
58	DSCN1116	.JPG	27-Jun-23	1205	John Penland	Spills and staining along rail track of rail and specialty wash area
59	DSCN1117	.JPG	27-Jun-23	1205	John Penland	Spills and staining along rail track of rail and specialty wash area
60	DSCN1118	.JPG	27-Jun-23	1206	John Penland	Spills and staining along rail track of rail and specialty wash area
61	DSCN1119	.JPG	27-Jun-23	1206	John Penland	Spills and staining along rail track of rail and specialty wash area
62	DSCN1120	.JPG	27-Jun-23	1206	John Penland	Spills and staining along rail track of rail and specialty wash area
63	DSCN1121	.JPG	27-Jun-23	1206	John Penland	Spills and staining along rail track of rail and specialty wash area

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Photo Number	File Name		Date	Time	Photographer	Description
64	DSCN1122	.JPG	27-Jun-23	1219	John Penland	Open-ended piping on tank T-1
65	DSCN1123	.JPG	27-Jun-23	1230	John Penland	Diaphragm pump and hoses used to drain containers of hazardous waste into tank T-1
66	DSCN1124	.JPG	27-Jun-23	1230	John Penland	Filter canister on pump line to tank T-1



Photo 1

HAZARDOUS WASTE
STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,
OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

PROPER D.O.T. SHIPPING NAME _____
HAZARDOUS PROPERTIES/DESCRIPTION: **HAZ WASTE SOLID**
TELEPHONE _____

GENERATOR INFORMATION:
NAME _____
ADDRESS _____
CITY _____
EPA ID NO. _____
STATE WASTE CODE: _____

ACCUMULATION START DATE _____
UN or DOT NO. _____
STATE MANIFEST TRACKING NO. _____

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES
PRINTED BY: DPI Direct, POWAY, CA (858) 674-7750 FAX: (858) 674-7730 www.labels.dpidirect.com

HAZ
waste
Solid

3
5
02



Photo 4



Photo 5



Photo 6



Photo 7

HAZARDOUS WASTE
STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

SHIPPING NO. UN1832, Waste Sulfuric Acid, Spent, (R), PG II, D002
NAME: Spent Alky Sulfuric Acid
CONTAINER No: ATSS990015
LAST CONTAINED: Spent Alky Sulfuric Acid
STATE: TX
CAS/PROFILE No: TILX 101041
PHONE: 2812917653
ZIP: 77597
DISPO: Wastewater
MANIFEST TRACKING NO: LABEL ID 46020
GENERATOR NAME: Alpha Technical Services
ADDRESS: 5100B Underwood Rd.
CITY: Pasadena
E.P.A. ID: TX08000047035 EPA WASTE # D002
Waste Type: Solid Heel
TICKET ID 94602
ACCU DATE 6/26/2023
CONTAINS HAZARDOUS OR TOXIC WASTES

HANDLE WITH CARE!



Photo 9



Photo 10



Pioneer Waste Services
281-542-1556

Photo 11



Photo 12



Photo 13



Photo 14



LD LMT 198200
LT WT 64800

ACE CENTER FLOW

2 INCH HP COMP SHOES

Photo 15



Photo 16

HAZARDOUS WASTE
STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

SHIPPING RQ, UN2949, Waste Sodium hydrosulfide, (8), PG II, D003

NAME: _____ CONTAINER No: 16721-80-5

LAST CONTAINED: Sodium Hydrogensulphide

CAS/PROFILE No: GATX 218649

DISPO: Wastewater

GENERATOR NAME: Alpha Technical Services

ADDRESS: 5100B Underwood Rd.

CITY: Pasadena

E.P.A. ID: TXR000047035 EPA WASTE #: D003

Waste Type: Solid Heel

TICKET ID 95197

ACCU DATE 6/26/2023

MANIFEST TRACKING NO: _____

LABEL ID 46021

CONTAINS HAZARDOUS OR TOXIC WASTES

HANDLE WITH CARE!



Photo 18

64TX
278082
0124123
Q.



Photo 20



Photo 21

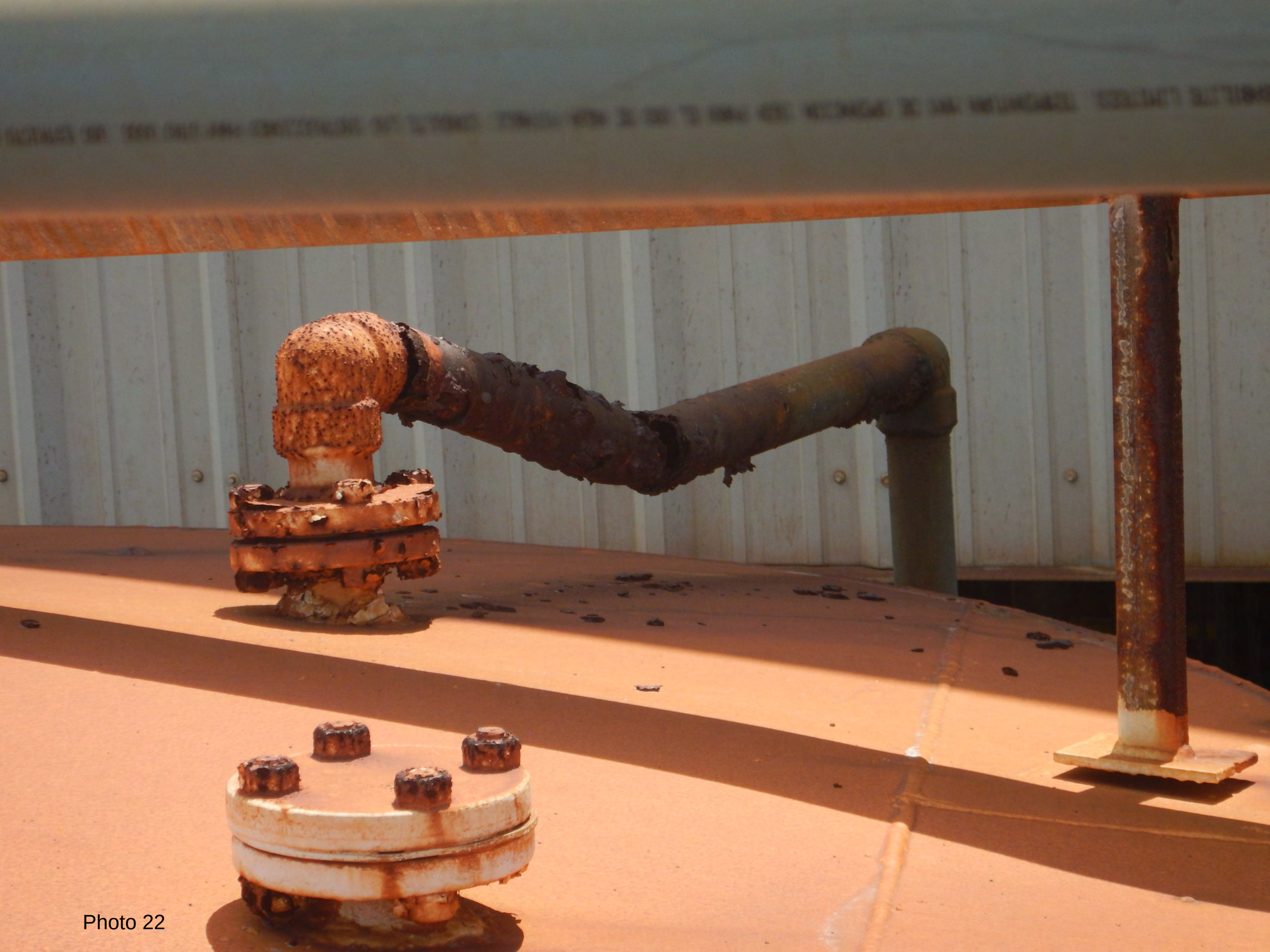


Photo 22



Photo 23

Solid Heel

SHRX 22 366

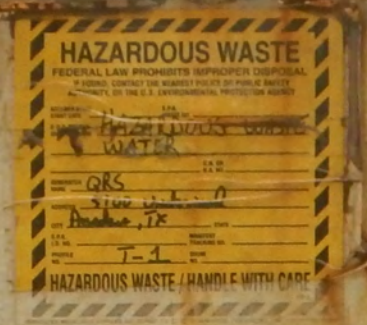
E 23

ED TS

FIF



Photo 25





CONFINE
ENTER
PERMIT ONE

Photo 27



Photo 28



Photo 29



Photo 30



Photo 31



Photo 32



**RCRA
STORAGE
AREA**



Photo 34



Photo 35



Photo 36



Photo 37



Photo 38



Photo 39



Photo 40

CAUTION
HAZARDOUS WASTE
SATELLITE ACCUMULATION POINT
UNAUTHORIZED PERSONNEL
KEEP OUT

1-844-018-5436
1-844-018-5436

HAZARDOUS WASTE	
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100	HAZARDOUS WASTE





Photo 42



Photo 43



Photo 44



Photo 45



Photo 46



Photo 47



Photo 48



Photo 49



Photo 50



Photo 51



Photo 52



Photo 53



HAZARDOUS WASTE
STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
SHIPPING TO: UN1993, WASTE FLAMMABLE LIQUID, NON-SPILL, (Solid) Methylalum EO Catalyst Residue (Ash Green/Huntman) CONTAINER No. 363605 - 1230

NAME: LAST CONTAINED: Waste: Methylalum EO Catalyst Residue (Ash Green/Huntman)
CAMP/PROFILE No: T-623 H
DISPO: Wastewater
GENERATOR NAME: Huntman ICI Chemicals
ADDRESS: 6001 Hwy 390
CITY: Port Neches
E.P.A. ID: TX000076046 EPA WASTE # 0005 0001
Waste Type: First - Flush
TICKET ID: 96360

PHONE: 4097233036
ZIP: 77640
STATE: TX
MANIFEST TRACKING NO: 46092
LABEL ID: 46092

ACCU DATE: 6/27/2023

HANDLE WITH CARE! CONTAINS HAZARDOUS OR TOXIC WASTES

1ST FLUSH
T-623H
6/27/23



Pioneer Waste Services
281-542-1556

GA
28

TTX 9650

UN2319
TERPENE HYDROCARBONS
N.O.S. (extremely flammable)

2X
441

HAZARDOUS WASTE		
STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL		
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY		
SHIPPING NO: UN1005, Waste AMMONIA, ANHYDROUS, (2.2,8.), PG II, D018		
NAME:		
LAST CONTAINED: DPA AMMONIA		
CAS/PROFILE No: UTLX 950644	CONTAINER No: ATS9991937	
DISPO: Haz wastewater		
GENERATOR NAME: Alpha Technical Services		
ADDRESS: 5100B Underwood Rd.		
CITY: Pasadena	PHONE: 2812917453	
E.P.A. ID: TXR000047035	STATE: TX	ZIP: 77507
EPA WASTE #: D018, D002		
Waste Type: First - Flush		
TICKET ID 94503	MANIFEST TRACKING NO:	
ACCU DATE 6/15/2023	LABEL ID 46050	
		
94503	*6/15/2023*	*46050*
HANDLE WITH CARE! CONTAINS HAZARDOUS OR TOXIC WASTES		
Yellow5		

441



Photo 57



Photo 58



Photo 59



Photo 60



Photo 61



Photo 62



Photo 63



Photo 64



Photo 65



Photo 66

APPENDIX 2

DAILY SUMMARY OF INSPECTION NOTES AND OBSERVATIONS

From: [Penland, John](#)
To: [Gardner, Dedriel](#); "mbass@quala.us.com"; "canderson@quala.us.com"; "cboyd@quala.us.com"; "cdurham@quala.us.com"
Cc: [Yurk, Jeffrey](#); karina.rocha@tceq.texas.gov
Subject: REVISED: Daily Summary for 2023 RCRA inspection of Quala #704 (TXR000047035) Pasadena, TX - June 26, 2023
Date: Tuesday, June 27, 2023 9:14:00 PM

Revised based on comments received and to include corrective actions taken by Quala during the walkthrough

From: Penland, John
Sent: Monday, June 26, 2023 8:55 PM
To: Gardner, Dedriel <Gardner.Dedriel@epa.gov>; mbass@quala.us.com; canderson@quala.us.com; cboyd@quala.us.com; cdurham@quala.us.com
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; karina.rocha@tceq.texas.gov
Subject: Daily Summary for 2023 RCRA inspection of Quala #704 (TXR000047035) Pasadena, TX - June 26, 2023

All,
Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Introduction

During the week of June 26, 2023, I, John Penland, will be conducting an unannounced inspection of the QualaWash Holdings, LLC #704 - Rail and Specialty facility (Quala #704), formerly Alpha Technical Services, facility located at 5100 Underwood Rd. in Pasadena, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). I will be assisted on this inspection by Environmental Protection Agency (EPA) inspector Dedriel Gardner. The inspection will include walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

Purpose

The Quala #704 facility was targeted for inspection as part of the Region 6 response to EPA's November 2022 [Drum Reconditioner Damage Case Report](#).

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Dedriel Gardner	Asst. Hazardous Waste Inspector	US EPA Region 6	281-983-2133	Gardner.Dedriel@epa.gov
Michael Bass	Director, EH&S	Quala	346-240-6645	mbass@quala.us.com
Courtney Durham	Environmental Manager	Quala	281-757-1423	cdurham@quala.us.com

Chuck Anderson	General Manager	Quala	281-714-1306	canderson@quala.us.com

Daily Summary

- Initial Entry to the facility - approximately 09:30am
- Opening meeting start – 09:35am
 - I presented my credentials to Mr. Michael Bass and informed him that we were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act
 - We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—
 - (1)to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2)to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
 - We discussed the purpose of EPA’s inspection – In response to the Drum Reconditioner Damage Case Report, this inspection is intended to: Assess of the Quala #704 facility’s regulatory status (ie, LQG/transporter); Evaluate the facility’s waste identification and characterization procedures; and Identify facility operations which could pose a risk of release of hazardous waste or hazardous constituents to the air, water, or land.
 - Discussed the right of Quala to assert a Confidential Business Information claim for records requested by EPA (see attachment)
 - Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to the inspection participants.
 - Discussed the inspection process – the inspection will be conducted during the week of June 26, 2023. The participants will meet at the facility at 9:30am each day to conduct the onsite portion of the inspection and discuss the findings of the ongoing records review. The records review will be conducted by the inspectors independently offsite throughout the week. Daily summaries will be provided by the inspectors at the end of each day to ensure a clear communication of questions and findings. EPA will schedule a closing conference, where EPA will summarize the overall findings of the inspection to that point and provide a plan for concluding any unfinished evaluation.

- General Facility Process – The Quala #704 facility is a transportation container washing facility located in Pasadena, Texas. This process generates: wastewater; used ppe; and residues removed from the containers.
- Initial request for compliance records, including:
 - A current Hazardous Waste Contingency Plan including records of distribution
 - Facility Maps identifying solid waste management units, if available
 - A facility process diagrams for tank systems, if available
 - Facility waste profiles for any solid waste generated since 2020. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge; see 40 CFR 262.11(f))
 - Any Hazardous Waste Manifests since 2020 not previously uploaded to E-manifest, if any
 - Facility SOPs related to the generation or management of hazardous waste
 - RCRA Unit inspection records since 2020 for tanks and container storage areas
 - Currently effective CAA Title V and NSR permits for hazardous waste management units
 - Subpart CC applicability evaluation for hazardous wastewater accumulated in Tank T1 (ie, documentation of the average VO content and maximum organic vapor pressure)
 - <90-day accumulation records for Tank T1
- Facility Walkthrough
 - Beginning at approximately 10:30am- This walkthrough of the facility was focused on familiarizing the inspection team with the function and layout of the process and to identify readily apparent management concerns. A more focused process review is planned for 06/27/2023
 - Warehouse and Central Waste Container Accumulation Area
 - Identified one Hazardous waste container labeled as “Haz Waste Solid” without an accumulation start date marked. Quala personnel immediately corrected this upon identification.
 - Tanker Trailer Wash Area
 - The building floor is being used as the primary impoundment and conveyance for wastewater to the WWTU. While sumps and pumps maybe considered ancillary equipment to a tank system, the building appears to more closely meet the definition of a containment building receiving free liquids.
 - Rail and Specialty Wash Area
 - Identified 16 individual containers actively managing a hazardous which were unlabeled. In each case, Quala personnel immediately applied labels following the container’s identification.
 - The facility has determined that the wastewater generated in this unit is a hazardous waste and accumulates it for disposal in tank T1. The wastewater is shipped to Texas Molecular for underground injection.
 - This tank is labeled as a hazardous waste tank.
 - The roof of this tank severely corroded with holes appearing to exceed 10

inches in diameter. One of the fill pipes for this tank is so severely corroded that it has collapsed. Organic odors were present.

- The closed vent system for this tank is breached in multiple locations.
- The concrete vault which serves as secondary containment for this tank is severely corroded with pits that extend beneath the tank floor.
 - Staining from apparent spills and releases is visible on the ground in this unit.
- Facility Operations Discussion
 - The Quala #704 facility receives non-RCRA empty containers of hazardous waste from TSDFs (including Clean Harbors). While a TSDF is allowed to send non-RCRA empty containers to an alternate facility (see 40 CFR 264.72(d)), that alternate facility must be a facility which is permitted to receive that waste as a designated facility. Quala #704 is claiming that it is allowed to conduct these repackaging operations as a transfer facility using its status as a hazardous waste transporter. However, this facility does not transport these waste shipments and often does not even sign the waste manifest. Facially, these operations appear to require a Part B permit so that the Quala #704 facility could serve as an alternate designated facility for these non-RCRA empty hazardous waste container shipments.
- Daily Wrap up meeting
- Departed Facility at approximately 2:45pm

Topics for inspection on June 27, 2023

- Process Walkthrough
 - Start to finish process walkthrough
 - Solid waste unit integrity evaluation
 - Non-RCRA Empty container management
- Records Review
 - Waste determination
 - Subpart CC Evaluation
 - Identification of personnel for training records review
 - Unit Inspection Records

From: [Penland, John](#)
To: [Gardner, Dedriel](#); canderson@quala.us.com; cboyd@quala.us.com; cdurham@quala.us.com; dmcmillan@wcmgroup.com; mbass@quala.us.com
Cc: [Yurk, Jeffrey](#); karina.rocha@tceq.texas.gov
Subject: Daily Summary for 2023 RCRA inspection of Quala #704 (TXR000047035) Pasadena, TX - June 27, 2023
Date: Wednesday, June 28, 2023 1:06:00 AM
Attachments: [cleaning containers FR-1980-11-25.pdf](#)

All,

Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Dedriel Gardner	Asst. Hazardous Waste Inspector	US EPA Region 6	281-983-2133	Gardner.Dedriel@epa.gov
Michael Bass	Director, EH&S	Quala	346-240-6645	mbass@quala.us.com
Courtney Durham	Environmental Manager	Quala	281-757-1423	cdurham@quala.us.com
Chuck Anderson	General Manager	Quala	281-714-1306	canderson@quala.us.com
Donna McMillan	Consultant	WCM Group	281-446-7070	dmcmillan@wcmgroup.com

Daily Summary

- Inspection Start - approximately 09:30am
- Facility Walkthrough
 - Beginning at approximately 10:30am- This walkthrough of the facility was focused on evaluating the individual process areas and waste management areas for compliance with the RCRA requirements.
 - Warehouse and Central Waste Container Accumulation Area (WMU 008)
 - At the time of inspection, the unit held the following inventory:
 - 10 55-gallon drums of hazardous waste tar oil
 - 3 totes Tar Oil
 - 6 55-gallon drums of hazardous waste Sodium Hydrosulfide
 - 8 55-gallon drums of hazardous waste sodium cyanide
 - 1 55-gallon drum of hazardous waste filters from tank T1
 - 1 55-gallon drum of hazardous waste DHLI (Clean Harbors listed as the generator on the waste label)
 - 1 55-gallon drum of hazardous waste solid (Covestra listed as the

- generator on the waste label)
 - 1 overpack drum of hazardous waste Dimethyl Disulfide
 - 2 55-gallon drums of 3A-L-Flammable Liquid
 - 2 totes Product Methanol
- A series of high voltage electrical boxes are located near the CAA. We requested a risk evaluation for the storage of flammable materials in this area (ie, a Fire Marshall's report or similar)
- Wash Bays
 - Wastewater tank 2A overtopped on 6/26. The release appears to be confined to the washout building. I have requested waste characterization documentation for the contents of this tank as well as P&ID drawings for this tank system.
 - We observed staining from drag out on exterior of the North side of the wash bays.
 - Identified 1 open 55-gallon drum used for the satellite accumulation of contaminated bucket liners used for the collection of heels from tanker trucks being cleaned in the wash bays.
 - Identified one open tote containing hazardous waste flammable liquids. This tote was also missing an accumulation start date.
- Maintenance bays
 - Identified one aerosol can puncturing drum. This drum was not marked as a hazardous waste accumulation container
 - Identified one tote being used for the accumulation of Used Oil. This container was open and unlabeled.
- Hazardous Waste Tank T1 (WMU 006)
 - The facility provided a PID to monitor VOC emissions from the holes in the tank roof.
 - MSA Altair5X (s/n:00159787) equipped with a 10.6 eV lamp and calibrated with isobutylene
 - Peak VOC reading >1250ppm (RF for n-hexane listed as 4.5; calculated measurement >5,625ppm VOC)
 - See calibration gas requirements at 40 CFR 261.1083(d)
 - The tank fill piping currently in service is constructed of PVC and is also used to convey liquids to the other two non-haz tanks in the unit. This flow is controlled using manual valves located on the top of the tanks. Waste is pumped from totes using a diaphragm pump located on the north end of the rail and specialty wash building.
 - Both the fill line and the discharge line from the tank were open and uncapped at the time of this inspection
- Sandblast area (WMU 004)
 - Used sandblast media was present on the ground, completely obscuring the underlying asphalt foundation. Since this area is located on the southwest boundary of the facility property silt fencing has been placed along the bottom of the chain link fence bordering this area.
 - We identified a potential offsite migration pathway for spent sandblast media and other potential releases from the facility at the south end of this area.

Discoloration of the soils was observed in this location.

- Rail and Specialty Wash Racks (WMU 005)
 - As noted previously, staining and discoloration of the underlying rock and soil is visible by the rail car cleaning racks. However, according to Chuck Anderson this area has a concrete liner designed to prevent migration of any spills. We have requested an as built drawing of this liner system
 - At the time of this inspection, the unit held the following inventory
 - 4 55-gallon drums of hazardous waste alky sulfuric acid
 - 1 55-gallon drum of hazardous waste V980 product
 - 3 totes hazardous waste sodium cyanide
 - 16 55-gallon drums of hazardous waste sodium hydrosulfide
 - 1 tote hazardous waste molybdenum catalyst
 - 1 55-gallon drum hazardous waste molybdenum catalyst (Hunstman listed as the generator on the waste label)
 - 4 totes hazardous waste tar oil
 - 7 totes hazardous waste anhydrous ammonia
 - The containers were previously identified as containing HCl used in the gas scrubber system and markings on the containers indicate that the waste in the containers has a pH <1.
- Waste management process and records discussion
 - Receipt of non-RCRA empty hazardous waste containers
 - We discussed the decision process and operating logs associated with the receipt of non-RCRA empty hazardous waste containers.
 - Received a copy of the Quala Rail and Specialty 10-day container protocol
 - We have requested a list of all non-RCRA empty hazardous waste containers received in the last 6 months.
 - 45 FR 78924 (see attached) discusses the management of non-RCRA empty containers in the context of container cleaning operations. According to this document, the management of non-RCRA empty containers is required to be conducted at the generator's facility or a permitted or interim status facility.
 - Operation of hazardous waste Tank T1
 - The tank has an operating capacity of 17,000 gallons
 - Approximately two 5,000 gallon shipments of hazardous waste water are shipped from this tank each calendar month
 - Quala does not conduct routine compatibility testing of hazardous waste prior to storage in hazardous waste Tank T1
 - A Subpart J tank engineering certification report has been provided for this tank
 - Electronic copy requested
 - We have requested P&ID drawings for this tank system
 - We have requested Subpart CC applicability records for this tank.
 - Facility inspection records
 - We have requested daily tank inspection records for tank T1
 - We conducted a cursory review of the weekly container inspection records for <90-day Container Storage Areas

The records provided only address those containers stored in WMU 008.
We have requested any records for container inspections conducted in WMU 005

- We have requested that the facility provide a complete set of container inspection records for the period of June 2022 to June 2023 for a more comprehensive review.
- Hazardous Waste Contingency Plan
 - We have conducted a cursory review of the contingency plan provided. This document indicates that it was last revised in January of 2023.
 - The provided document does not have the required Quick Reference Guide attached
 - We are also requesting a record of distribution of this document to the relevant outside emergency response authorities listed in the document
- Personnel Training records
 - We are requesting records demonstrating the facility's compliance with the training requirements of 262.17 for the following personnel:
 - Martine Nugyen
 - Korey Landry
 - Courtney Durham
 - Todd Pierott
 - Corey Johnson
 - Jason Glover
 - Kelvin Peterson
 - Chuck Anderson
- Ongoing request for compliance records, including:
 - A current Hazardous Waste Contingency Plan including records of distribution
 - Provided in part
 - Facility Maps identifying solid waste management units, if available
 - Hardcopy only
 - A facility process diagrams for tank systems, if available
 - Facility waste profiles for any solid waste generated since 2020. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge; see 40 CFR 262.11(f))
 - Any Hazardous Waste Manifests since 2020 not previously uploaded to E-manifest, if any
 - Facility SOPs related to the generation or management of hazardous waste
 - Specifically those records related to the management of wastes after the point of generation (eg, heels after removal; hazardous waste placed in tank T1, etc)
 - RCRA Unit inspection records since 2020 for tanks and container storage areas
 - For CSAs only June 2022 to June 2023
 - Currently effective CAA Title V and NSR permits for hazardous waste management units
 - Subpart CC applicability evaluation for hazardous wastewater accumulated in Tank T1 (ie, documentation of the average VO content and maximum organic vapor pressure)
 - <90-day accumulation records for Tank T1

Risk evaluation for the storage of flammable materials near high voltage electrical in WMU 008 (ie, a Fire Marshall's report or similar)

- Characterization records for wastes in tank 2A
 - As built drawings for liner system in Railcar washing area
 - Subpart J Engineering certification report for Tank T1
 - Personnel training records for selected personnel (40 CFR 262.17)
-
- Daily Wrap up meeting
 - Departed Facility at approximately 5:10 pm

Topics for inspection on June 28, 2023

- Records delivery and review
- Closing Conference

John Penland

Senior Environmental Scientist (ECDSR)

Enforcement and Compliance Assurance Division

Waste Enforcement Branch

EPA Region 6 1201 Elm St., Suite 500

Dallas, Texas 75270

(214)665-9717

From: [Penland, John](#)
To: canderson@quala.us.com; cdurham@quala.us.com; mbass@quala.us.com; cboyd@quala.us.com; dmcmillan@wcmgroup.com; [Gardner, Dedriel](#)
Cc: karina.rocha@tceq.texas.gov; [Yurk, Jeffrey](#)
Subject: Daily Summary for 2023 RCRA inspection of Quala #704 (TXR000047035) Pasadena, TX - June 28, 2023
Date: Wednesday, June 28, 2023 9:01:00 PM

All,

Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Dedriel Gardner	Asst. Hazardous Waste Inspector	US EPA Region 6	281-983-2133	Gardner.Dedriel@epa.gov
Michael Bass	Director, EH&S	Quala	346-240-6645	mbass@quala.us.com
Courtney Durham	Environmental Manager	Quala	281-757-1423	cdurham@quala.us.com
Chuck Anderson	General Manager	Quala	281-714-1306	canderson@quala.us.com
Donna McMillan	Consultant	WCM Group	281-446-7070	dmcmillan@wcmgroup.com

Daily Summary

- Inspection Start - approximately 09:30am
- Records Review
 - Facility inspection records
 - We reviewed 12 months of <90-day Container storage area inspections for WMU 008. (June 2022-June 2023)
 - All records appeared to be present and complete
 - The documents omit any waste compatibility determinations [See 40 CFR 262.17(a)(1)(vii)(C)]
 - The facility was unable to provide any inspection records for WMU 005 (Rail and Specialty Wash Area)
 - The facility was unable to provide any inspection records for WMU 006 (Tank T1).
 - Hazardous Waste Contingency Plan
 - We reviewed the Contingency Plan
 - The Plan does not include a map showing evacuation routes
 - The Plan does not include a map showing the location of emergency

response equipment

- Quick Reference Guide –
 - The facility Quick Reference Guide underrepresents the quantity of waste managed at the site.
 - This item was corrected on identification but the revised QRG will need to be distributed to the relevant response agencies.
- Personnel Training records
 - We conducted a cursory review of the facility's personnel training records to provide guidance as to which records would be relevant for our review. A more comprehensive review is planned for 6/29/2023
 - We are requesting records demonstrating the facility's compliance with the training requirements of 262.17 for the following personnel:
 - Martine Nugyen
 - Korey Landry
 - Courtney Durham
 - Todd Pierott
 - Corey Johnson
 - Jason Glover
 - Kelvin Peterson
 - Chuck Anderson
- Waste Minimization Plan
 - Reviewed with no immediate concerns noted
- WWT Tank 2A Sludge Analytical Report
 - Report shows that the sludge in the tank is non-haz. Onsite pH screening shows no immediate concerns.
- Hazardous Waste Manifests for facility generated wastes
 - Reviewed 12 months with no immediate concerns noted
- Waste Characterization Forms
 - Reviewed hard copy Waste Characterization Forms for wastes in NOR.
 - Forms do not identify UHCs
- Waste Profiles for onsite generated waste
 - Reviewed hardcopies provided with no immediate concerns
- Tote Inventory Log
 - Several occurrences of unknown wastes being added to the hazardous waste tanks
 - Records requested for these wastes
- Ongoing request for compliance records, including:
 - A current Hazardous Waste Contingency Plan including records of distribution
 - Provided in part
 - Facility Maps identifying solid waste management units, if available
 - Provided
 - A facility process diagrams for tank systems, if available
 - Provided in part

Facility waste profiles for any solid waste generated since 2020. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge; see 40 CFR 262.11(f))

- Provided
 - Any Hazardous Waste Manifests since 2020 not previously uploaded to E-manifest, if any
 - None
 - Facility SOPs related to the generation or management of hazardous waste
 - Specifically those records related to the management of wastes after the point of generation (eg, heels after removal; hazardous waste placed in tank T1, etc)
 - RCRA Unit inspection records since 2020 for tanks and container storage areas
 - For CSAs only June 2022 to June 2023
 - Currently effective CAA Title V and NSR permits for hazardous waste management units
 - Provided
 - Subpart CC applicability evaluation for hazardous wastewater accumulated in Tank T1 (ie, documentation of the average VO content and maximum organic vapor pressure)
 - <90-day accumulation records for Tank T1
 - Provided Outgoing waste manifests showing removal or wastes from the tank > 17,000 gallons per 90-days
 - Risk evaluation for the storage of flammable materials near high voltage electrical in WMU 008 (ie, a Fire Marshall's report or similar)
 - Characterization records for wastes in tank 2A
 - Hardcopy provided and reviewed. No Further action needed
 - As built drawings for liner system in Railcar washing area
 - Subpart J Engineering certification report for Tank T1
 - Personnel training records for selected personnel (40 CFR 262.17)
 - Requested Copies of selected documents showing waste management under Quala's 10-day protocol.
 - Hardcopy provided
 - Tote Inventory Logs : 2023 YTD; 10/27/2022; 10/26/2022; 9/9/2022; 6/29/2022
- Departed Facility at approximately 3:30 pm

Topics for inspection on June 29, 2023

- Records delivery and review
- Closing Conference

John Penland

Senior Environmental Scientist (ECDSR)

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Cc: [Yurk, Jeffrey](#); karina.rocha@tceq.texas.gov
Subject: Daily Summary for 2023 RCRA inspection of Quala #704 (TXR000047035) Pasadena, TX - June 29, 2023
Date: Thursday, June 29, 2023 9:25:00 PM

All,

Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Dedriel Gardner	Asst. Hazardous Waste Inspector	US EPA Region 6	281-983-2133	Gardner.Dedriel@epa.gov
Michael Bass	Director, EH&S	Quala	346-240-6645	mbass@quala.us.com
Courtney Durham	Environmental Manager	Quala	281-757-1423	cdurham@quala.us.com
Chuck Anderson	General Manager	Quala	281-714-1306	canderson@quala.us.com
Arthur Davis	EHS Specialist	Quala	346-208-3400	
Chuck Boyd	Vice President for Environmental	Quala	706-375-8865	cboyd@quala.us.com

Daily Summary

- Inspection Start - approximately 09:30am
- Tank Maintenance
 - Met with Mike Patterson to discuss maintenance activities conducted on hazardous waste Tank T1
 - According to Mr. Patterson, the following maintenance activities had been conducted on the tank:
 1. Replacement of the PVC fill lines
 2. Replacement of the electronic level indicator
 3. Tank thickness assessment and replacement of the tank bottom
 - We are requesting records for these maintenance activities
 - He also stated that he believes that the roof failed between 6 and 9 months ago.
- Tank level measurements
 - The facility maintains records of daily tank levels for Tank T1. We are requesting copies of these records.
- Training Records review.
 - We reviewed the records collected for a review of the personnel training records. We

have requested that these records be provided electronically for offsite review.

- Ongoing request for compliance records, including:
 - A current Hazardous Waste Contingency Plan including records of distribution
 - 1. Provided in part. Need evacuation maps, emergency equipment map, and quick reference guide
 - Facility Maps identifying solid waste management units, if available
 - 1. Provided
 - A facility process diagrams for tank systems, if available
 - 1. Provided in part. Need Tank system diagram depicting Tank T1
 - Facility waste profiles for any solid waste generated since 2020. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge; see 40 CFR 262.11(f))
 - 1. Provided
 - Any Hazardous Waste Manifests since 2020 not previously uploaded to E-manifest, if any
 - 1. None
 - Facility SOPs related to the generation or management of hazardous waste
 - 1. Specifically those records related to the management of wastes after the point of generation (eg, heels after removal; hazardous waste placed in tank T1, etc)
 - RCRA Unit inspection records since 2020 for tanks and container storage areas
 - 1. Provided
 - Currently effective CAA Title V and NSR permits for hazardous waste management units
 - 1. Provided
 - Subpart CC applicability evaluation for hazardous wastewater accumulated in Tank T1 (ie, documentation of the average VO content and maximum organic vapor pressure)
 - <90-day accumulation records for Tank T1
 - 1. Provided Outgoing waste manifests showing removal or wastes from the tank > 17,000 gallons per 90-days. Also requesting Tank level measurement records
 - Risk evaluation for the storage of flammable materials near high voltage electrical in WMU 008 (ie, a Fire Marshall's report or similar)
 - Characterization records for wastes in tank 2A
 - 1. Hardcopy provided and reviewed. No Further action needed
 - As built drawings for liner system in Railcar washing area
 - Subpart J Engineering certification report for Tank T1
 - Personnel training records for selected personnel [40 CFR 262.17(a)(7)]
 - Requested Copies of selected documents showing waste management under Quala's 10-day protocol.
 - 1. Hardcopy provided
 - Tote Inventory Logs : 2023 YTD; 10/27/2022; 10/26/2022; 9/9/2022; 6/29/2022
 - Tank Maintenance and repair records
- Closing Conference:
 - Recap of inspection authority (RCRA Section 3007) and inspection purpose
 - Areas of Concern identified during this inspection:

1. Open containers of hazardous waste 40 CFR 262.17(a)(1)(iv)(A)
 - We observed 5 containers which were in hazardous waste service and open when unattended and not being filled or emptied
 - Corrected upon identification.
2. Unlabeled containers of hazardous waste 40 CFR 262.17(a)(5)(i)
 - We observed 16 containers which were used to accumulate hazardous waste but were not marked with a hazardous waste label or accumulation start date
 - Corrected upon identification
3. Containers missing accumulation start date 40 CFR 262.17(a)(5)(i)(c)
 - We observed 1 container in WMU 008 which was used for the accumulation of hazardous waste and not marked with an accumulation start date
 - Corrected upon identification
4. Unlabeled container of Used Oil 40 CFR 279.22(c)
 - We observed 1 container used for the accumulation of Used Oil which was unlabeled
5. Failure to inspect a hazardous waste container central accumulation area 40 CFR 262.17(a)(1)(v)
 - The facility has been unable to provide any documentation to show that the container central accumulation WMU 005 has been inspected. According to Courtney Durham at the time of this inspection, only WMU 008 is inspected on a weekly basis.
6. Failure to remove accumulated liquids from the secondary containment of a hazardous waste tank 40 CFR 262.17(a)(2)->265.193(c)(4)
 - On both June 26 and June 27 during this inspection we observed accumulated liquids in the secondary containment of Tank T1 (WMU 006)
7. Failure to construct or line the secondary containment of a hazardous waste tank with compatible or impervious materials 40 CFR 262.17(a)(2)->265.193(c)(1)
 - During this inspection we observed extensive corrosion and pitting of the secondary containment system for Tank T1 (WMU 006). The secondary containment damage is present in the floor of the concrete liner throughout the containment area and pitting appears to extend to a depth of more than 1 inch.
8. Failure to have procedures in place to exclude incompatible waste from Tank T1. 40 CFR 262.17(a)(2)->265.199(a)
 - The RCRA regulations provide for a strict prohibition on the introduction of incompatible wastes to a hazardous waste storage tank. At Quala #704, this appears to be implemented solely through administrative controls without routine waste sampling. We have not been provided with a written procedure that explicitly describes this exclusion process. Due to the hazardous and very often incompatible nature of the waste managed by the facility this process is an important feature of overall process safety management. (see 40 CFR 262.251)

9. Failure to conduct daily inspections of hazardous waste tank T1. 40 CFR.17(a)(2)->265.195(a)
 - The facility has been unable to provide any documentation to show that the hazardous waste tank T1 is being inspected on a daily basis. According to Courtney Durham at the time of this inspection, this activity has not been conducted
10. Failure to conduct annual inspections of a hazardous waste tank subject to Subpart CC controls. 40 CFR 262.17(a)(2)->265.1085(c)(4)
 - The facility has been unable to provide any documentation to show that the roof and emission controls for hazardous waste tank T1 are being inspected on an annual basis. According to Courtney Durham at the time of this inspection, this activity has not been conducted.
 - Assumes a Level 1 control standard based on the >500ppm VOC content and <26m³ tank volume
11. Failure to document and maintain records of the Maximum Organic Vapor Pressure for a tank subject to Subpart CC controls 40 CFR 262.17(a)(2)->265.1090(b)(2)(i)
 - The facility has been unable to provide any documentation to show that the Maximum Organic Vapor Pressure test described in 40 CFR 265.1084(c) has been conducted.
 - Assumes a Level 1 control standard based on the >500ppm VOC content and <26m³ tank volume
12. Failure to equip a tank subject to the Level 1 control requirements of Subpart CC with a fixed roof meeting the specifications of 40 CFR 265.1085(c)(2)
 - During this inspection we observed holes in the roof of Tank T1 estimated to be larger than 10 inches in diameter. VOC measurements from these openings exceeded 500ppm above background.
 - Assumes a Level 1 control standard based on the >500ppm VOC content and <26m³ tank volume
13. Potential offsite release of industrial waste 30 TAC 335.4
 - During this inspection we observed that sand blast media was uncontained in the sand blast area and offsite migration was observed into a drainage ditch outside of the fence line. In this same area we observed staining of the soils with an unknown black material that also appeared to be following a release pathway from the facility.
 - This area of concern will require additional investigation by the facility to identify the source, nature, and extent of this potential release.
14. Failure to protect flammable waste from potential ignition by electrical spark. 40 CFR 262.17(a)(1)(vi)(B). see also 40 CFR 262.251
 - During this inspection we observed that containers of flammable hazardous waste were being accumulated near high voltage electrical panels.
 - A fire marshal is scheduled to evaluate and provide guidance for these panels on June 30, 2023
15. Management of containers of incompatible waste. 40 CFR 262.17(a)(1)(vii)(C)

- The facility manages a large amount of potentially incompatible waste containers. During our inspections of WMU 005 and WMU 008, we did not see spill pallets, posted incompatible waste guidance, or any other means to prevent the comingled storage of incompatible waste containers
 - Important Note: No actual incompatible storage has been observed during this inspection. This concern is precautionary.
16. Failure to fully characterize hazardous waste 40 CFR 262.11
- During our review of the facility's Tote Inventory records, we found several entries marked as "unknown". These "unknown" containers were subsequently added to hazardous waste tank T1.
17. Operation of a hazardous waste storage facility without a permit. 40 CFR 270.1
- As part of its normal operations, the facility receives and manages manifested hazardous waste from TSDFs. While a TSDF is allowed to send non-RCRA empty containers to an alternate facility (see 40 CFR 264.72(d)), that alternate facility must be a facility which is permitted to receive that waste as a designated facility. Quala #704 is claiming that it is allowed to conduct these repackaging operations as a transfer facility using its status as a hazardous waste transporter. However, this facility does not transport these waste shipments and often does not even sign the waste manifest. Facially, these operations appear to require a Part B permit so that the Quala #704 facility could serve as an alternate designated facility for these non-RCRA empty hazardous waste container shipments. This position is reinforced in 45 FR 78924 which discusses the management of non-RCRA empty containers in the context of container cleaning operations. According to this document, the management of non-RCRA empty containers is required to be conducted at the generator's facility or a permitted or interim status facility.

- Departed Facility at approximately 3:15 pm

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