

RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Veolia ES Technical Solutions, LLC
2176 Will Suitt Road
Creedmoor, North Carolina 27522
County: Granville

Latitude: 36° 07' 59''
Longitude: 78° 43' 41''
EPA ID Number: NCD986166338
Primary NAICS – 562211 – Hazardous Waste Treatment and Disposal
SIC Code - 4953 – Refuse System

3) Responsible Official

Jay L. Beck
Facility Operations Manager
Mid-Atlantic Branch, Technical Solutions, North America
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4) Inspection Participants

Parvez Mallick, U. S. EPA Region 4
Jack Kitchen, Environmental Senior Specialist, NCDEQ
Jay L. Beck, Facility Operations Manager, Veolia ES Technical Solutions, LLC
Sean Ward, Environmental Compliance Supervisor, Veolia ES Technical Solutions, LLC

5) **Date of Inspection**

March 25, 2021, 8:30 a.m.

6) **Applicable Regulations**

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939f), 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and NCHWMR, 15A NCAC 13A .0101 to .0119. North Carolina Administrative Code and North Carolina Permit No. NCD986166338 R3.

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 Compliance Evaluation Inspection**

On March 25, 2021, Jack Kitchen, North Carolina Department of Environmental Quality (NCDEQ), and Parvez Mallick, EPA Region 4, conducted an announced compliance evaluation inspection (CEI) at Veolia ES Technical Solutions, LLC (Veolia or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead joint inspection. Veolia was represented by Jay L. Beck, Facility Operations Manager and Sean Ward, Environmental Compliance Supervisor. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed.

8) **Facility Description**

Veolia ES Technical Solutions, LLC (Veolia or the facility) operates as a RCRA hazardous waste storage and transfer facility permitted by NCDEQ. The facility operates under RCRA permit number NCD986166338 R3 issued on August 30, 2017. The current permit expiration date is August 30, 2022. The facility is located on a 25-acre site, the facility consists of an office building for sales and operations personnel, a 10,000-sq. ft. warehouse for equipment storage, and a 3,120-sq. ft. covered loading dock for receiving and transferring wastes. Veolia is open for operations 8:00 a.m. to 5:00 p.m. Monday through Friday and employs 14 workers at the facility. Hazardous and non-hazardous wastes are temporarily stored at this location while awaiting transportation to an off-site destination recycling, treatment, or disposal facility. Tank storage, treatment, or disposal activities are not performed at the Veolia facility.

All waste materials received and placed into storage are packaged in appropriate containers as prescribed in the permit. Temporary storage of containerized wastes occurs in trailers parked at a 24 by 130-ft loading dock located in the rear of the facility with a secondary containment system. The secondary containment system consists of a 50 by 130-foot concrete pad and trench system on each side of the loading dock to prevent the escape of waste materials in the environment in the event of a release. The dock and secondary containment system are covered by a roof. The trench on each side of the dock is divided into two separate sections by a six-inch valve that normally remains in the closed position. A four-inch-wide separation curb divides the base on each side of the dock into two separate sections providing four separate secondary containment sections that allow for separation of incompatible waste. The containment capacity of the

secondary containment system on each side of the dock is 4,906 gallons. The secondary containment trenches are equipped with gas monitors as a precaution. An additional containment trench is located in the southeast quadrant. The capacity of this trench is 4,570 gallons. A cargo tank holding up to 7,000 gallons of liquid waste may be stored in the southeast quadrant.

The loading dock has space for 20 waste containing units (bays) such as trailer for storage of small and mid-sized containers, roll-off boxes, and cargo tanks. Hazardous wastes are segregated depending on their waste contents and stored in twenty trailers, all of which store specific waste streams and waste types. The designated “storage only” trailers are not utilized to transport the wastes off-site.

The maximum amount of hazardous waste that may be on site is 88,000 gallons or 1,600, 55-gallon containers. Generally, all RCRA listed and characteristic waste is accepted as identified. The types of wastes managed at this facility generally fall into two categories: (1) packaged laboratory chemicals (lab packs) and (2) containerized liquids and solids. Some of these wastes are classified as hazardous waste due to the chemical properties they exhibit (ignitable, corrosive, and reactive, or toxic) or listed wastes as established by the EPA and the NCDEQ. The container sizes range from 1-gallon pails and small fiberboard containers to 55-gallon drums and intermediate bulk container to roll-off and cargo tanks. Veolia is permitted to comingle compatible solid and liquid hazardous waste. The maximum treatment capacity is 10,000 gallons per day.

9) **Inspection Findings**

The Creedmoor facility is permitted to store non-hazardous and all RCRA and state hazardous wastes excluding PCBs, medical and radioactive wastes. The facility utilizes a bar code scanning system to track the location and status of all wastes received and shipped off-site. The operations at this facility consist of the receipt, storage, *treatment* (consolidation only), and transportation of containerized hazardous wastes. Consolidation or repackaging of Lab packs is performed; however, smaller containers within a lab pack are not opened. Liquid wastes are not combined during the consolidation activities at this facility. Tank storage or disposal activities are not conducted at this location. The maximum storage capacity of the facility is 1,600, 55-gallon drums or the volumetric equivalent in other sized containers. The inspectors performed a walk-through inspection of the facility with Jay Beck and Sean Ward of Veolia. Below is a description of the observations made during the walk-through.

Warehouse

The facility utilizes one 55-gallon satellite accumulation area (SAA) in the warehouse near the entrance to the loading dock. This SAA was used to accumulate site generated hazardous waste solids, floor sweeps and PPEs. The container was closed, marked with the words “Hazardous Waste” and with an indication of the hazards of the contents.

Loading Dock

Facility representatives stated that this facility began operations as a 10-day hazardous waste transfer station in 1988. In 1990, the facility filed a RCRA Part B permit application for storage and treatment of hazardous waste. On the day of the inspection, each of the 20 available slots at the loading dock were occupied by trailers. The facility representatives stated that bays 12, 14, 16, and 18 were used for inbound and outbound trailers. The remainder of the bays were occupied by trailers used to segregate and store containers of hazardous waste. There were two

heat sensors over each trailer with a direct alarm to the fire department. There were two halotron fire extinguishers set at 165 degrees F. Hazardous waste containers received by Veolia can go either straight to trailer for shipment off-site or be stored for fewer than 365 days in on the of the storage trailers.

During the inspection, the inspectors noted numerous containers on the surface of the dock between the storage trailers. This area is not included in the permitted storage area for the facility. Veolia clears this area every night and does not store hazardous waste on the dock. Veolia may want to consider maintaining a coating on the dock to match the secondary containment requirements. If a container comes off a trailer and begins to leak, it would be advised to have this surface also be impervious.

The inspectors toured each of the bay's trailers and inspected containers condition, markings, accumulation start dates, and waste types. The facility representatives stated that they do not open containers of hazardous waste at their facility. The following table shows hazardous waste inventory summary by storage location during the inspection:

Hazard Class	Description	Weight (lbs.)
	P02 – In-transit Pad Location 2	
None	DOT non-regulated waste	32,533.0
	Storage Trailer - T01 (bases, flammables, and compatibles)	
3	FLAMMABLE LIQUID	2,195.0
8	CORROSIVE MATERIAL	12,038.0
9	MISCELLANEOUS HAZARDOUS MAT.	2,563.0
NONE	DOT NON-REGULATED	1,223.0
	Storage Trailer - T02 (acids, flammables, and compatibles)	
6.1	POISONOUS MATERIAL	800.0
8	CORROSIVE MATERIAL	12,969.0
9	MISCELLANEOUS HAZARDOUS MAT.	87.0
NONE	DOT NON-REGULATED	292.0
	Storage Trailer - T03 (bases, poisons, and compatibles)	
2.1	FLAMMABLE GAS	155.0
6.1	POISONOUS MATERIAL	180.0
8	CORROSIVE MATERIAL	7,005.0
9	MISCELLANEOUS HAZARDOUS MAT.	1,894.0
NONE	DOT NON-REGULATED	4,566.0
	Storage Trailer - T04 (acids, flammables, and compatibles)	
2.1	FLAMMABLE GAS	201.0
6.1	POISONOUS MATERIAL	194.9
8	CORROSIVE MATERIAL	6,110.0
9	MISCELLANEOUS HAZARDOUS MAT.	476.0
COM	COMBUSTIBLE LIQUID	34.0
NONE	DOT NON-REGULATED	3,790.0
	Storage Trailer - T05 (bases, flammables, and compatibles)	

2.1	FLAMMABLE GAS	100.0
3	FLAMMABLE LIQUID	1,690.0
8	CORROSIVE MATERIAL	4,544.0
9	MISCELLANEOUS HAZARDOUS MAT.	3,013.0
NONE	DOT NON-REGULATED	9,125.
	Storage Trailer - T06 (acids, flammables, combustibles, and compatibles)	
2.1	FLAMMABLE GAS	478.0
3	FLAMMABLE LIQUID	3,220.0
6.1	POISONOUS MATERIAL	605.0
8	CORROSIVE MATERIAL	8,288.0
9	MISCELLANEOUS HAZARDOUS MAT.	56.0
NONE	DOT NON-REGULATED	5,246.0
	Storage Trailer - T07 (bases and compatibles)	
6.1	POISONOUS MATERIAL	31.1
8	CORROSIVE MATERIAL	270.0
9	MISCELLANEOUS HAZARDOUS MAT.	850.0
NONE	DOT NON-REGULATED	7,457.0
	Storage Trailer - T08 (acids, flammables, and compatibles)	
3	FLAMMABLE LIQUID	1,505.0
4.1	FLAMMABLE SOLID	9.0
6.1	POISONOUS MATERIAL	524.0
8	CORROSIVE MATERIAL	8,586.0
9	MISCELLANEOUS HAZARDOUS MAT.	739.0
COM	COMBUSTIBLE LIQUID	1,100.0
NONE	DOT NON-REGULATED	2,335.0
	Storage Trailer - T09 (bases, flammables, and compatibles)	
1.4S	EXPLOSIVES DIVISION 1.4S	78.0
2.2	NON-FLAMMABLE COMPRESSED GAS	1,628.0
4.1	FLAMMABLE SOLID	3,203.0
4.2	SPONTANEOUSLY COMBUSTIBLE MAT.	105.0
4.3	DANGEROUS WHEN WET MATERIAL	288.0
6.1	POISONOUS MATERIAL	100.0
8	CORROSIVE MATERIAL	37.0
9	MISCELLANEOUS HAZARDOUS MAT.	100.0
NONE	DOT NON-REGULATED	441.0
	Storage Trailer – T10 (acids, flammables, and compatibles)	
2.1	FLAMMABLE GAS	296.0
2.2	NON-FLAMMABLE COMPRESSED GAS	35.0
3	FLAMMABLE LIQUID	3,825.0
4.1	FLAMMABLE SOLID	52.0
6.1	POISONOUS MATERIAL	86.2
8	CORROSIVE MATERIAL	6,008.0
9	MISCELLANEOUS HAZARDOUS MAT.	1,848.0

NONE	DOT NON-REGULATED	1,856.0
	Storage Trailer – T11 (flammables and compatibles)	
2.1	FLAMMABLE GAS	856.0
2.2	NON-FLAMMABLE COMPRESSED GAS	298.0
3	FLAMMABLE LIQUID	4,488.0
4.1	FLAMMABLE SOLID	174.0
9	MISCELLANEOUS HAZARDOUS MAT.	6,649.0
NONE	DOT NON-REGULATED	723.0
	Storage Trailer – T12 (acids, flammables, and compatibles)	
8	CORROSIVE MATERIAL	2,788.0
9	MISCELLANEOUS HAZARDOUS MAT.	215.0
NONE	DOT NON-REGULATED	16,692.0
	Storage Trailer – T13 (flammables and compatibles)	
2.1	FLAMMABLE GAS	2,434.0
2.2	NON-FLAMMABLE COMPRESSED GAS	50.0
3	FLAMMABLE LIQUID	376.0
4.1	FLAMMABLE SOLID	1,166.0
6.1	POISONOUS MATERIAL	209.0
9	MISCELLANEOUS HAZARDOUS MAT.	4,036.0
NONE	DOT NON-REGULATED	200.0
	Storage Trailer – T14 (DOT compatibles)	
2.1	FLAMMABLE GAS	603.0
2.2	NON-FLAMMABLE COMPRESSED GAS	398.0
3	FLAMMABLE LIQUID	21,048.0
4.1	FLAMMABLE SOLID	575.0
6.1	POISONOUS MATERIAL	450.0
9	MISCELLANEOUS HAZARDOUS MAT.	490.0
COM	COMBUSTIBLE LIQUID	500.0
NONE	DOT NON-REGULATED	1,937.0
	Storage Trailer – T15 (flammables and compatibles)	
2.1	FLAMMABLE GAS	534.0
3	FLAMMABLE LIQUID	3,669.0
4.1	FLAMMABLE SOLID	454.0
6.1	POISONOUS MATERIAL	192.0
9	MISCELLANEOUS HAZARDOUS MAT.	485.0
NONE	DOT NON-REGULATED	690.0
	Storage Trailer – T16 (empty during the inspection)	
	Storage Trailer – T17 (bases, flammables, and compatibles)	
2.1	FLAMMABLE GAS	275.2
2.2	NON-FLAMMABLE COMPRESSED GAS	333.0
2.3	POISONOUS GAS	6.0
3	FLAMMABLE LIQUID	2,013.0
4.1	FLAMMABLE SOLID	451.2
6.1	POISONOUS MATERIAL	628.0
8	CORROSIVE MATERIAL	2,347.0

9	MISCELLANEOUS HAZARDOUS MAT.	229.1
COM	COMBUSTIBLE LIQUID	2.0
NONE	DOT NON-REGULATED	1,505.0
	Storage Trailer – T18 (DOT compatibles)	
2.1	FLAMMABLE GAS	414.0
3	FLAMMABLE LIQUID	2,268.6
4.1	FLAMMABLE SOLID	835.0
4.2	SPONTANEOUSLY COMBUSTIBLE MAT.	5.0
4.3	DANGEROUS WHEN WET MATERIAL	10.0
6.1	POISONOUS MATERIAL	1,537.1
8	CORROSIVE MATERIAL	1,452.0
9	MISCELLANEOUS HAZARDOUS MAT.	18,529.0
COM	COMBUSTIBLE LIQUID	8.0
NONE	DOT NON-REGULATED	4,373.
	Storage Trailer – T19 (flammables and compatibles)	
2.1	FLAMMABLE GAS	984.0
2.2	NON-FLAMMABLE COMPRESSED GAS	22.1
3	FLAMMABLE LIQUID	184.0
4.1	FLAMMABLE SOLID	7,196.0
6.1	POISONOUS MATERIAL	1,613.0
8	CORROSIVE MATERIAL	156.4
9	MISCELLANEOUS HAZARDOUS MAT.	3,551.0
	Storage Trailer – T20 (oxidizers and compatibles)	
3	FLAMMABLE LIQUID	88.4
5.1	OXIDIZER	5,368.3
5.2	ORGANIC PEROXIDE	163.0
6.1	POISONOUS MATERIAL	50.6
8	CORROSIVE MATERIAL	2,165.6

All hazardous waste containers were closed, properly marked with the words “Hazardous Waste,” with the indication of the hazard(s), and had an accumulation start date less than 365 days during the inspection. The containers were in good condition, with adequate aisle space, and no spills and leaks observed on the floor during the inspection. The inspectors observed that the loading dock and secondary containment area without any cracks.

Security and Documentation Access

Veolia maintains a security and surveillance system. Entry to the facility is controlled during normal business hours by Veolia personnel by monitoring access. All entrance gates and doors are securely closed and locked whenever the facility is left unattended. During non-business hours when the facility is unattended unauthorized entry is prohibited and detected using surveillance infra-red cameras, photo beams and an alarm system. The facility is also equipped with monitors to detect a discharge that could directly or indirectly cause a fire, explosion, or release of hazardous constituents to the environment. Infrared hydrocarbon gas detectors are installed in areas surrounding the shipping and receiving area and provide detection of hydrocarbon vapors in lower explosive limits ranges. The security fencing was inspected and was found in good condition.

Veolia hired a monitoring company to review footage and respond to alarms. There are

approximately five Veolia employees that have ability to remotely log into system and see real time footage from the site cameras. The security system is monitored remotely 24 hours a day, 7 days a week by a third-party security company.

The facility is also equipped with an electronic weather system, which includes wind speed and direction that is monitored remotely. Windssocks are mounted on the roof and were in working order at the time of the inspection. The facility has internal communications, phones, fire extinguishers, fire control equipment, spill kits, decontamination equipment and adequate water supply.

In the case of an emergency, accurate records would be needed to appropriately respond to the emergency. The facility utilizes a system called E-Plan which is managed by the University of Dallas to store and access records remotely. Most of the TSDs in North Carolina are using this system for remote access to inventory records.

Records Review

The inspection team reviewed the facility records including the manifests and bills of lading, biennial report, training records, waste analysis plan, contingency plan, closure plan, the permit, 2020 annual groundwater monitoring report, land disposal restrictions (LDRs) and inspection records, among other records.

- Manifests are maintained both on-site as well as electronically. Due to COVID-19 restriction and precautions, E-manifests have been reviewed remotely before and after the inspection. Daily inventory is maintained electronically and attached the E-Plan website. NCDEQ and First Responders have access to this information;
- The facility's most recent Biennial Report submitted to NCDEQ on February 23, 2020 for 2019 hazardous waste generation;
- The most recent hazardous waste training was conducted February 17-24, 2021. The inspectors reviewed 2019 and 2020 training records as well;
- The contingency plan was most recently updated on December 7, 2020 and was submitted to the Butner Police and Fire Departments and Duke University Hospital. The facility attached and submitted the contingency with its Tier II data to the E-Plan's Online Tier II reporting system;
- The inspector reviewed the most recent updated contingency plan dated December 7, 2020 and Quick Reference Guide;
- The 2020 Annual Groundwater Monitoring Report dated 4/16/20 and Storm water outfall analysis dated 4/30/20 were reviewed. Groundwater sampling most recently occurred on March 3, 2021 and Stormwater Sampling on April 30, 2021. The most recent sampling analysis reports were pending review by the NCDEQ Facility Management Branch at the time of the inspection.
- The equipment is tested annually by an outside vendor. The fire extinguishers were most recently tested and replaced if required in March 2021. All extinguishers were labeled and dated;
- Veolia uses a waste approval process to ensure compliance with the LDRs. During the initial review between the generator and Veolia representative a Waste Information Profile is completed for each waste stream. The LDR information on the WIP is used to determine whether the waste is subject to the LDRs. Veolia ensures that the requisite Land Disposal Restriction notice and certification information, as applicable, is provided and maintained;
- Daily inspection logs are maintained on-site and were reviewed during the inspection.

There were no apparent violations noted during the records review.

10) Out-Briefing

The inspectors conducted the exit meeting with Mr. Jay Beck and Mr. Sean Ward. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Based on the observations made during the inspection, Veolia appeared to be in compliance with the RCRA requirements.

11) Signed

Signature
Parvez Mallick
Inspector and Author of Report

Date

12) Concurrence and Approval

Signature
Araceli B. Chavez
Chief
RCRA Enforcement Section

Date