



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

BASIC INFORMATION

Facility Name: Specialty Chemicals and Systems **RCRA ID:** CO0000195180

Facility Location:
4940 Jackson Street
Denver, CO 80216

Facility Contact:
Richard Martin, President and Co-Owner
303-885-7975
SCS4650@aol.com

Notification Status:
Not a Generator of Hazardous Waste

Date of Inspection: May 16, 2023
Arrival Time: 9:15 a.m.
Departure Time: 10:45 a.m.

Lead Inspector & Report Author: Kristin McNeill, U.S. EPA RCRA Inspector

Inspection Attendees:

1. David Foster, Colorado Department of Public Health and Environment (CDPHE) RCRA Inspector
2. Richard Martin, Specialty Chemicals and Systems president and co-owner
3. Matt Bezjak, Specialty Chemicals and Systems manager
4. Katie Jeffrey, Specialty Chemicals and Systems office manager (720-940-5926)

Type and Purpose of Inspection: Compliance Evaluation Inspection
Compliance with RCRA Subtitle C

Facility Type: NAICS 325611 – Soap and Other Detergent Manufacturing

Applicable Regulations: 6 CCR 1007-3 Parts 260-279

Inspection Type: Unannounced Inspection
EPA inspection with CDPHE accompanying

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

OPENING CONFERENCE

The front door of the facility was locked, so we found Mr. Bezjak at the loading dock, where he contacted Ms. Jeffrey via phone. I spoke with Mr. Bezjak and Ms. Jeffrey to explain the purpose of the inspection. I presented my credentials to Mr. Bezjak. We were not denied access to the facility and were

allowed to inspect all areas that we selected for inspection. Mr. Bezjak accompanied us throughout the indoor areas of the facility until Mr. Martin arrived and accompanied us in the outdoor areas. Upon Mr. Martin's arrival, I presented my credentials to him.

The following information was obtained verbally during the inspection from Mr. Bezjak or Mr. Martin unless otherwise noted.

FACILITY DESCRIPTION

Regulatory Status

According to RCRAInfo, Specialty Chemicals and Systems is not a generator of hazardous waste. During the inspection, Mr. Martin confirmed that the facility does not generate hazardous waste. Based on my observations of waste generation and the amount of waste onsite, I did not observe any generation of hazardous waste. The most recent notification in RCRAInfo was from 2006.

General Facility and Process Description

The facility operates Monday through Friday 9:00 a.m. – 5:00 p.m. and is comprised of a warehouse of approximately 15,000 square feet plus office space. According to Mr. Bezjak and Mr. Martin, the facility has been operating at this location for approximately 10-12 years.

Mr. Bezjak stated that the facility manufactures dish and laundry detergents, soap for car washes and other cleaners. He explained that they make the soap and detergent, put it into bottles and label the bottles. He said that some of their products are distributed by other companies, and I observed two pallets of product labeled as Cowboy Chemical out of Casper, Wyoming.

Mr. Bezjak said that they began operating at this location approximately 10-12 years ago, in about 2012-2013. He said that when they were moving from their previous location, they operated out of both locations for 3-4 years. Mr. Martin said that their previous location was nearby on Leyden Street. Mr. Bezjak said that they "got rid of stuff" from the previous location when they moved to this location.

Mr. Bezjak said that they do not use many aerosol cans, but when they are empty, they dispose of them in the trash. He said that Waste Management picks up their waste.

TOUR INFORMATION

All photos described below are included in Attachment 1 – Photo Log.

Mr. Bezjak led us on a tour of the indoor areas of the facility, and Mr. Martin led us on a tour of the outdoor areas of the facility. I did not observe the generation of hazardous waste or universal waste at the facility.

Mr. Bezjak listed some of their commonly used ingredients as sodium chloride, potassium chloride and ethyl butyrate. He also said that they use formaldehyde in some products to prevent growth. I also saw drums of raw materials labeled as triethanolamine, potassium hydroxide, phosphoric acid and hydrochloric acid. Mr. Bezjak stated that they rarely use the hydrochloric acid. He also explained that they do not generate much waste, as they want to put all of the raw materials into their products. I

observed three tanks used for mixing product. Mr. Bezjak said that they had capacities of 440, 1000 and 3000 gallons.

In regard to spills, Mr. Bezjak said that they clean up any liquids and collect them into a neutralization tank before putting them down the drain, which goes to the sanitary sewer. He said that they test the pH using test strips, and neutralize using caustic (sodium hydroxide) or acid (phosphoric) before discharging. He said that they ensure that the pH is in the 7-8 range before discharging 2-3 times per week. Mr. Martin said that they do not have a discharge permit. Mr. Foster advised him to check with the Metro Water District to make sure they do not need a discharge or pretreatment permit.

In the outdoor area of the facility, I observed three conex boxes, which Mr. Bezjak and Mr. Martin said held their packaging materials. At our request, Mr. Martin opened two of them so we could observe the contents.

In the outdoor area of the facility, I observed 34 55-gallon drums and two 250-gallon totes labeled as hand sanitizer (photo 4), as well as eight 55-gallon drums labeled as denatured ethyl alcohol. Mr. Martin explained that they belonged to the previous owner of the facility, Joe Janecky. He said that the facility allowed Mr. Janecky to store the containers of alcohol and hand sanitizer, and that they did not manufacture or distribute the hand sanitizer. Mr. Martin was not sure how long the containers had been there but estimated that it had been about two years. Because this product is being stored at Specialty Chemicals and Systems, it is the responsibility of the facility to ensure that it is properly managed and disposed of. There is a total of approximately 2,400 gallons of hand sanitizer, along with approximately 450 gallons of denatured ethyl alcohol. Alcohol-based hand sanitizer and denatured ethyl alcohol are ignitable hazardous wastes (waste code D001) when disposed of.

Next to the containers of hand sanitizer, I observed approximately 13 drums that appeared to have been outside for a long period of time. Mr. Martin said that when they closed the previous location, some materials were moved to this location, and that to his knowledge, none of the products were out of date and none of the raw materials were past their expiration dates. There were two green 55-gallon drums labeled as isopropyl alcohol, which Mr. Martin said were product, along with eleven other metal and poly 55-gallon drums (photos 3 & 4). I observed that the metal drums were rusted and at least one of them was not closed (center drum in photo 3). I observed two drums labeled as Carsofoam BS-1 baby shampoo concentrate, one with a plastic lid that was cracked in half, exposing the material to the elements, and the other which was not closed. I noted that some drums had labels, although some of the labels were old and not able to be read, and other drums were unlabeled (photos 1 & 2). Some of the labels that I could decipher were Carsofoam BS-1 baby shampoo concentrate, Carsoquat SDQ-85 and Bardac 208M. After the inspection, I reviewed the information in the Safety Data Sheets for these three compounds, and Carsofoam and Carsoquat do not appear to be considered hazardous waste. However, the flash point for Bardac 208M is 46°C, therefore it would be an ignitable hazardous waste, which is defined as a liquid with a flash point of less than 60°C.

To the east of the first set of drums, I observed an area with approximately 39 additional 55-gallon drums. There were two blue poly drums on a pallet with one black metal drum labeled as windshield washer fluid (photo 5). I looked at all sides of the blue poly drums and did not observe any labels. I observed that some of the drums in this area were labeled and some were not (photos 6 – 9). Pallets and other material blocked my access to the area of these drums, so I was not able to read any of the labels. I

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observed that at least two of the drums in this area were open. Behind the drums, Mr. Martin said that there were supersacks of cardboard (in the background of photos 6 and 7).

CLOSING CONFERENCE

During the closing conference with Mr. Martin, I stated that they should determine if the drums in the outside yard hold material that will be used or if they are waste. For all drums determined to be waste, a hazardous waste determination must be made. Any materials determined to be waste or hazardous waste must be disposed of in an appropriate manner. I explained that the facility can use laboratory analysis or process knowledge to make the hazardous waste determinations.

SIGNATURES

KRISTIN MCNEILL Digitally signed by KRISTIN MCNEILL
Date: 2023.06.06 11:56:52 -06'00'

Kristin McNeill, Lead RCRA Inspector

JANICE PEARSON Digitally signed by JANICE PEARSON
Date: 2023.06.08 16:19:33 -06'00'

Janice A. Pearson, Manager
RCRA & OPA Enforcement Branch
Enforcement and Compliance Assurance Division

ATTACHMENTS

Attachment A: Photo log

ATTACHMENT A: PHOTO LOG

The photos are original and have not been modified in any way. All photos were taken by Kristin McNeill on May 16, 2023, using a Nikon Coolpix A900 camera.

Photo 1.
Label on drum
with cracked lid
in outside yard
(DSCN0095.JPG)

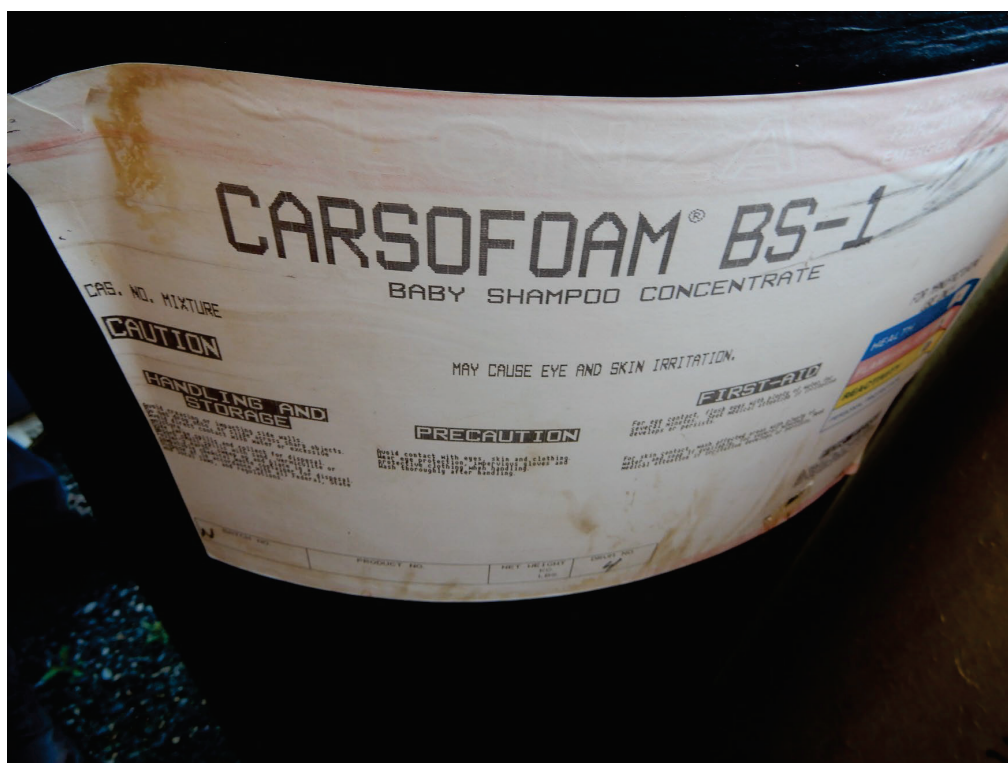


Photo 2.
Label on fiber
drum in outside
yard originally
read:
“CARSOQUAT
SDQ-85; stearyl
dimethylbenzyl
ammonium
chloride”
(DSCN0096.JPG)



Photo 3.

Two green drums of product isopropyl alcohol and nine drums moved from previous location (DSCN0097.JPG)



Photo 4.

Two 250-gallon totes and 34 55-gallon poly drums of hand sanitizer product with eight drums of denatured ethyl alcohol and two drums moved from previous location (blue and black drums on far left) (DSCN0098.JPG)



Photo 5.
Two unlabeled
55-gallon blue
poly drums of
product and one
black 55-gallon
drum labeled as
windshield
washer fluid
(DSCN0099.JPG)



Photo 6.
Drums with
unknown
contents in the
outside yard
(DSCN0100.JPG)



Photo 7.
Left side of photo
6
(DSCN0101.JPG)



Photo 8.
Right side of
photo 6
(DSCN0102.JPG)



Photo 9.
Additional
unknown poly
drums in outside
yard
(DSCN0103.JPG)

