

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Safety-Kleen Systems, Inc.
7027 Commercial Drive
Morrow, GA 30260

EPA ID# GAD981265424

3) Responsible Officials

Rodney Matthews
Branch Manager
rodney.matthews2@safety-kleen.com

4) Inspection Participants

Rodney Matthews, Safety-Kleen
David George, Safety-Kleen

Deadre Embrey, GAEPD
Mark Anthony Relon, USEPA
William Kappler, USEPA

5) Date of Inspection

December 14, 2022, 9:06 AM

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 et seq., and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018); and Hazardous Waste Permit HW-028(S&CA)-2.

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity (LQG) generator of hazardous waste is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Safety-Kleen Systems, Inc. (hereinafter, “Safety-Kleen” or “facility”) compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit [HW-028(S&CA)-2], the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Facility Description

Safety-Kleen owns and operates a hazardous waste collection facility in Clayton County, Georgia. This facility provides environmental services, oil re-finishing, and cleaning solutions. The facility’s parts washer provides services such as removing and replenishing used solvents. The facility reclaims used oil and offers solvent collection and reclamation services to customers. Currently, 16 employees work at the facility. The facility’s days and hours of operation are from Monday to Friday, 7am-7pm. They serve approximately 1200 customers. In December 2012, Safety-Kleen was purchased by Clean Harbors, Inc. Access to the facility is controlled through a locked, security door at the front entrance.

The facility is a Large Quantity Generator (LQG) and Treatment, Storage, and Disposal Facility (TSDF) with their latest notification dated February 1, 2022. Hazardous wastes generated at the facility include, but are not limited to, the EPA waste codes D001, D004-D011, D018, D019, D021-D030, D032-D043, F002, F003, F005. Safety-Kleen's Hazardous Waste Facility Permit [HW-028 (S&CA)-2] was issued on July 26, 2017 and expires on July 26, 2027. The NAICS Number for this facility is 562112 – Hazardous Waste Collection.

9) Previous Inspection History

Georgia Environmental Protection Division (GAEPD) has conducted two (2) RCRA CEIs at the subject facility between 2019 and 2022 and found eight (8) violations during those inspections.

The USEPA has conducted one RCRA CEI at the subject facility on September 17, 2015 and found three (3) violations during the inspection.

On August 16, 2021, the GAEPD conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

10) Opening Conference

On December 14, 2022, EPA inspectors Mark Anthony Relon and William Kappler, accompanied by GAEPD inspector Deadre Embrey, arrived at Safety-Kleen at approximately 9:05am. Rodney Matthews, Branch Manager, immediately received the inspectors. Rodney Matthews, and the inspectors were joined by Carl Williams, through phone, for the opening conference. The inspectors introduced themselves, showed their credentials to Rodney Matthews, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Carl Williams provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Return and Fill Station

Safety-Kleen manages a SAA in the Return and Fill Station for managing hazardous waste combustible liquids that is generated by receiving wastes from customer facilities. The inspectors observed one 55-gallon container in this SAA. The drum was located adjacent to one of two metal box fill station containers that send waste solvents to their hazardous waste tank. The drum was equipped with a latching lid (for draining into an open head drum), which was closed (Figure 2). The drum was marked as “SOLVSLDG-MOR,” labeled D001, D018, D039, D040 hazardous waste “Solvent Sludge – Branch Generated,” and identified with a US Department of Transportation (DOT) flammable placard (Figure 1).

Sampling Area

The facility manages a SAA in the Sampling Area for managing hazardous waste combustible liquid that is generated by sampling customers waste for characterization. The inspectors observed one 55-gallon container in this SAA. The drum was located near the Supplies Area entrance, and it was equipped with a latching lid (for draining into an open head drum), which was closed (Figure 4). The drum was marked as “SOLVSLDG-MOR,” labeled D001, D018, D039, D040 hazardous waste “Solvent Sludge – Branch Generated,” and identified with a DOT flammable placard (Figure 3).

Supplies Area

The Supplies Area consists of parts washer, oil, grease, chemicals such as acetone, and other products stored for future facility use. Inspectors observed no hazardous waste stored in this area

Container Storage Area

The facility manages a permitted Container Storage Area for managing hazardous waste combustible liquid that is generated by receiving wastes from customer facilities. The inspectors observed four (4) 55-gallon containers in this area (Figures 5, 6, 8, 10). The drums were located on pallets adjacent to the 10-Day Storage Area, and were equipped with drum covers, all of which were closed. The first drum was marked as “SOLVSLDG-MOR,” labeled D001, D018, D039, D040 hazardous waste “Solvent Sludge – Branch Generated,” and identified with a DOT flammable placard (Figure 5). The second drum was marked as “SOLVSLDG-MOR,” labeled D001, D018, D039, D040 hazardous waste “Solvent Sludge – Branch Generated,” and identified with a DOT flammable placard (Figure 7). The third drum was marked as “DEBRISLQ-MOR,” labeled D001, D004-D011, D018, D019, D021-D025, D027-D030, D032-D043, F003, F005 hazardous waste “Branch Debris (Solid/Liquid),” and identified with a DOT flammable placard (Figure 9). The fourth drum was marked as “SOLVSLDG-MOR,” labeled D001, D018, D039, D040 hazardous waste “Solvent Sludge – Branch Generated,” and identified with a DOT flammable placard (Figure 11).

Safety-Kleen manages universal waste lamps in their Container Storage Area. The inspectors observed six (6) containers of universal waste lamps in this area during the inspection. The six (6) 2-foot box containers of lamps were closed and marked with an accumulation start date, were labeled universal waste lamps (Figure 12). The oldest date observed on any container of lamps was December 12, 2022.

10-Day Storage Area

Safety-Kleen manages a 10-Day Storage Area within their Container Storage Area for managing hazardous waste combustible liquid that is generated by receiving wastes from customer facilities. The inspectors observed three (3) 55-gallon containers and one 20-gallon container in this area. The drums were located on pallets adjacent to the permitted Container Storage Area, and were equipped with drum covers, all of which were closed. The first drum was labeled D001, D005-D008, D035, F003, F005 hazardous waste paint, and identified with a DOT flammable placard (Figure 13). The second drum was labeled D001, D005-D008, D035, F003, F005 hazardous waste paint, and identified with a DOT flammable placard (Figure 14). The third drum was labeled D001, D018, D035, D039, D040, F003, F005 hazardous waste paint related material, and identified with a DOT flammable placard (Figure 15). The 20-gallon container was labeled D001, D005-D008, D035 hazardous waste paint, and identified with a DOT flammable placard (Figure 16).

Used Oil Area

Outside the Container Storage Area, the facility manages used oil. Inspectors observed a container with used oil filters left open. Inspectors recommended facility personnel to close the container to prevent accidental spills or releases to the environment.

Tank Farm

Safety-Kleen manages a SAA beside the Tank Farm for managing hazardous waste solvent sludge that is generated by cleaning the Tank Farm area. The inspectors observed one 55-gallon container in this area. The drum was located outside the Tank Farm secondary containment, and was equipped with a drum cover lid, which was closed.

A total of five (5) storage tanks were observed; four (4) used oil tanks and one permitted hazardous waste tank. Inspectors observed the hazardous waste tank, labeled hazardous waste and identified with a National Fire Protection Association (NFPA) label. The current reading level for the sight glass was 6 feet 9.5 inches (Figure 17). Inspectors observed multiple instances within the tank farm displaying tags (such as #001, 002, 13, 15, 17, and 18) that were difficult to read due to rust and weathering (Figures 18-22).

Pursuant to HW Permit HW-028 (S&CA)-2, III.C. Operating Requirements, the Permittee shall comply with all applicable requirements of Ga. Comp. R. and Regs. 391-3-11-.10(2) [40 CFR 264 Subpart BB]. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.10(2) [40 C.F.R. §264.200], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(2) [40 C.F.R. Part 264 Subpart BB], each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment as required by Ga. Comp. R. and Regs. 391-3-11-.10(2) [40 C.F.R. § 264.1050(d)].

Pursuant to HW Permit HW-028 (S&CA)-2, III.C. Operating Requirements, the Permittee shall comply with all applicable requirements of Ga. Comp. R. and Regs. 391-3-11-.10(2) [40 CFR 264 Subpart CC] for all wastes with an average volatile concentration of 500 ppm by weight.

Record Review

Contingency Plan:

The actions that facility personnel should take in response to an emergency are described in the facility's contingency plan, which was last updated on March 23, 2017.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals, or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Randy Conner is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the contingency plan (and its quick reference guide) was most recently submitted to the police department, fire department, hospital, State emergency response teams on March 23, 2017.

Inspectors asked facility personnel to provide QRG records by January 16, 2023.

The quick reference guide (QRG) includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for each position description. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Safety-Kleen provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2019 to 2022.

Waste Manifest Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2019 to 2022 calendar years. Hazardous waste manifest records show that D001 hazardous waste combustible liquid (Petroleum Naphtha), D008 hazardous waste liquid (Lead), D039 hazardous waste liquid (Perchloroethylene), etc., are routinely shipped to Clean Harbors (EPAID: ARD069748192), and the most recent shipment was made on December 19, 2022, at the time of the facility's January 13, 2023 document submittal.

Inspection Records:

The inspectors reviewed Safety-Kleen's available records of inspections of the hazardous waste permitted Container Storage Area from 2019 to 2022 calendar years. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about aisle space, visible container labels, legible container labels, complete container labels, closed lids and bungs, etc. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Each week, the employee records notations of observations and necessary follow-up actions for the inspected areas.

12) Closing Conference

The inspectors conducted the exit meeting at approximately 3:45pm with Rodney Mathews, Carl Williams, and David George. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Safety-Kleen agreed to provide their documents on the QRG records and the correct storage date for the 15-gallon container received on November 22, 2022, by January 16, 2023. On January 13, 2023, Carl Williams provided QRG records and the correct storage date for the November 22, 2022, 15-gallon container in an email to USEPA inspectors Mark Anthony Relon and William Kappler, and GAEPD inspector Deadre Embrey.

13) List of Appendices

Appendix 1 – Photo Log:

22 Photos taken on: December 14, 2022

Photos taken by: Mark Anthony Relon

Photos taken with: Samsung Camera (Model WB250F)

EPA Property Tag: S75917

14) **Signed**

**MARK ANTHONY
RELON** Digitally signed by MARK
ANTHONY RELON
Date: 2023.03.02 09:58:21
-05'00'

Mark Anthony Relon
Environmental Engineer

WILLIAM KAPPLER Digitally signed by WILLIAM
KAPPLER
Date: 2023.03.02 10:30:29 -05'00'

William Kappler
Environmental Scientist

Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2023.03.02 13:54:11 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Mark Anthony Relon, US EPA

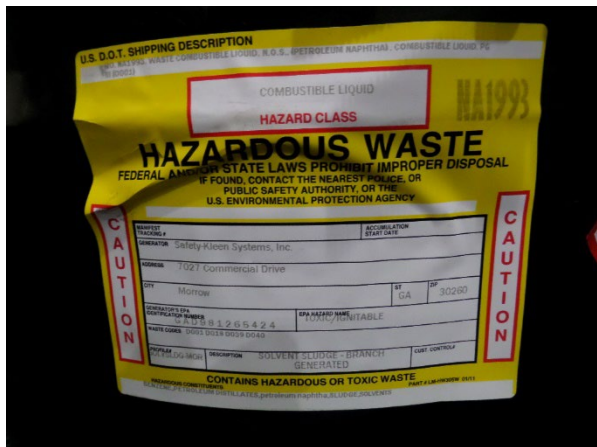


Figure 1: 10:10 AM Return and Fill Station



Figure 2: 10:10 AM Return and Fill Station

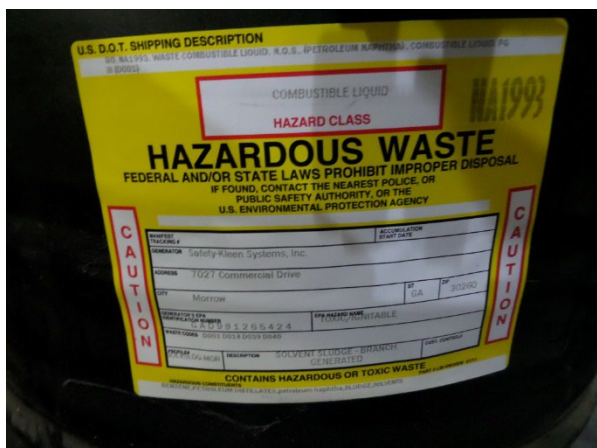


Figure 3: 10:28 AM Sampling Area



Figure 4: 10:28 AM Sampling Area



Figure 5: 10:34 AM Container Storage Area



Figure 6: 10:34 AM Container Storage Area

Appendix 1
Safety-Kleen
RCRA CEI Photographs
Mark Anthony Relon, US EPA

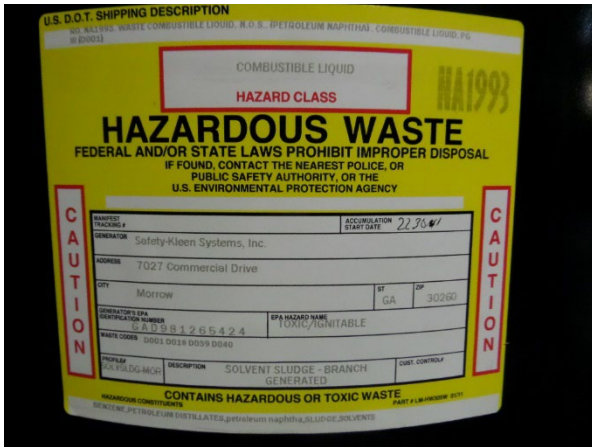


Figure 7: 10:35 AM Container Storage Area



Figure 8: 10:35 AM Container Storage Area

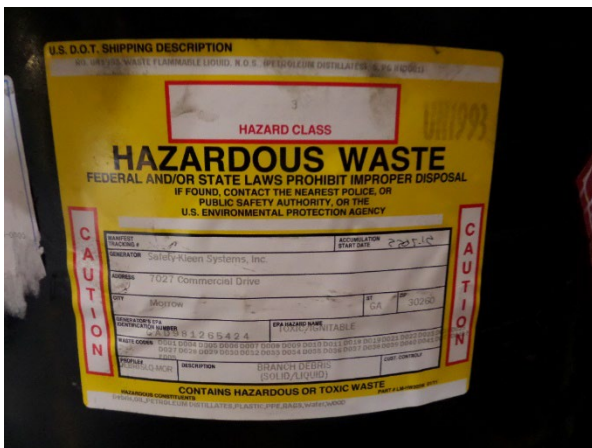


Figure 9: 10:35 AM Container Storage Area

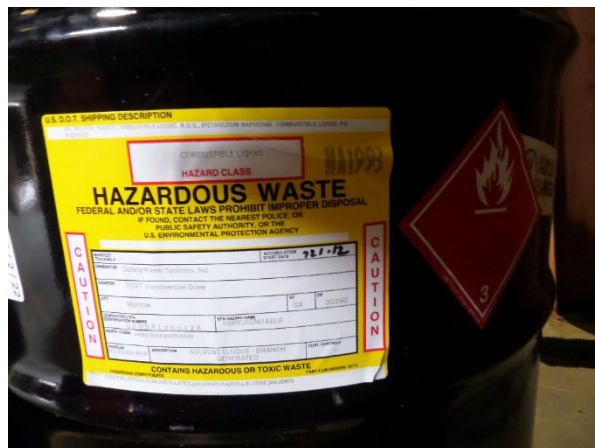


Figure 10: 10:35 AM Container Storage Area

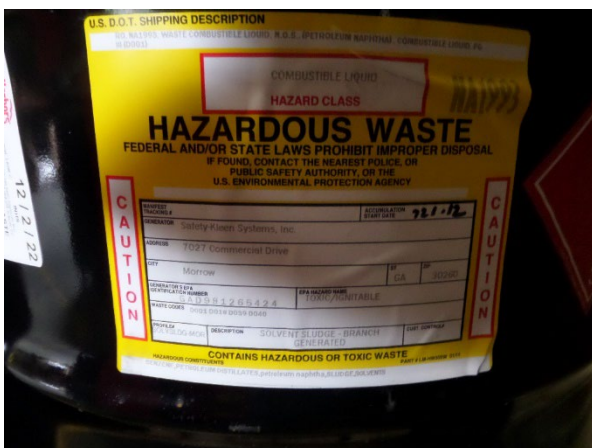


Figure 11: 10:35 AM Container Storage Area



Figure 12: 10:36 AM Container Storage Area

Appendix 1
Safety-Kleen
RCRA CEI Photographs
Mark Anthony Relon, US EPA

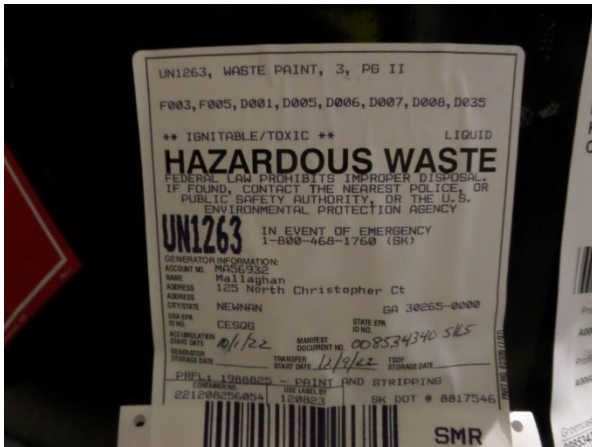


Figure 73: 10:37 AM 10 Day Storage Area

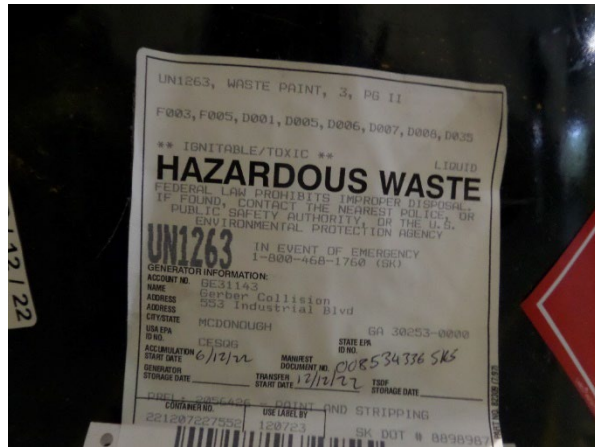


Figure 14: 10:38 AM 10 Day Storage Area

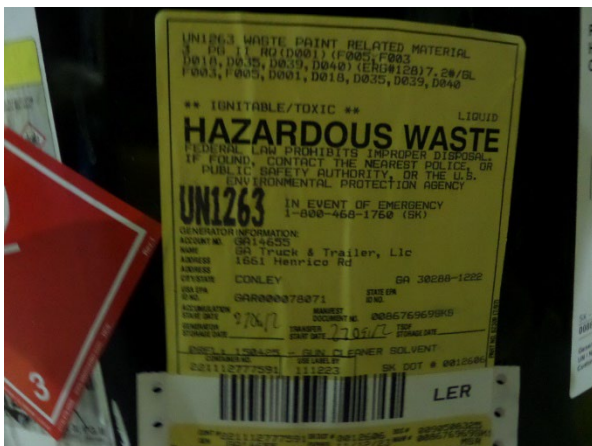


Figure 15: 10:38 AM 10 Day Storage Area

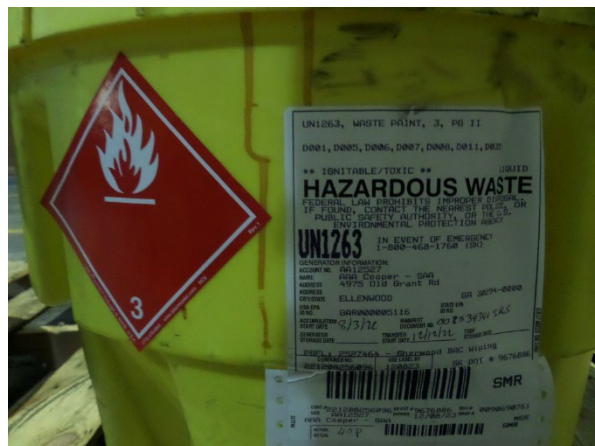


Figure 16: 10:40 AM 10 Day Storage Area



Figure 17: 11:15 AM Tank Farm



Figure 18: 11:53 AM Tank Farm

Appendix 1
Safety-Kleen
RCRA CEI Photographs
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Figure 89: 11:54 AM Tank Farm



Figure 20: 11:54 AM Tank Farm



Figure 21: 11:54 AM Tank Farm



Figure 22: 11:54 AM Tank Farm