

## **RCRA Inspection Report**

### **1) Inspector and Author of Report**

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### **2) Facility Information**

Safety Kleen, Archdale  
6182 Old Mendenhall Road  
Archdale, North Carolina 27263

EPA ID# NCD077840148

### **3) Responsible Officials**

Andrew Tilley, Branch Manager

### **4) Inspection Participants**

Andrew Tilley, Safety Kleen  
Bryan Kimball, Safety Kleen  
Keith Smith, Safety Kleen

Mark Burnette, NCDEQ  
Jack Kitchen, NCDEQ  
Laurie Benton DiGaetano, USEPA

### **5) Date of Inspection**

October 18, 2022

### **6) Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine Safety Kleen's compliance with the conditions of its Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Permit Number NCD077840148 R3 (the RCRA Permit), and with the applicable requirements of RCRA and the corresponding NCDEQ regulations. This was an EPA lead inspection.

### **7) Applicable Regulations<sup>1</sup>**

RCRA Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), Title 15A of the North Carolina Administrative Code (NCAC), Chapter 13; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

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<sup>1</sup> 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 15A NCAC 13A .0107(a) [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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

## **8) Facility Description**

### Company Description:

Safety-Kleen Systems, Inc. (SK), a subsidiary of Clean Harbors Inc., is an international service-oriented company whose customers are primarily engaged in after-market automotive repair, industrial maintenance, manufacturing and dry-cleaning. The company has been operating since 1968, and offers solvent distribution, collection and reclamation services. Through SK’s waste recovery service, a customer can lease material from SK and use it in machines that are either provided by SK or owned by the customer. Customers use SK parts-cleaner solvents, known as parts washer solvent and immersion cleaners, to clean oil, grease and dirt from metal parts. SK collects used parts cleaning solvents for recycling and subsequent reuse and replaces the collected material with clean solvents. SK also collects used materials from the dry-cleaning industry and paint waste/used lacquer thinners from a variety of customers.

SK has operated for over forty years, and currently services several hundred thousand customers throughout North America. According to the Waste Analysis Plan, SK’s customers are typically very small quantity generators (VSQGs) and small quantity generators (SQGs) of hazardous waste and nearly 80% are in the automotive after-market business. SK reports that customers typically generate only one type of hazardous waste, and that those wastes are well known and relatively homogeneous. SK has a company-wide Annual Recharacterization Process to evaluate the homogeneity of each waste stream and determine its associated pervasive TCLP-based hazardous waste codes. According to SK, historical operating and analytical records indicate that the characteristics of customers’ waste streams do not significantly change from year to year.

### Waste Descriptions:

SK may receive various waste streams, including used solvents, dry cleaner wastes, paint wastes, photographic processing wastes, used immersion cleaner, used oil, and, on occasion, household hazardous waste at this facility. The primary function of the facility, however, is to serve as an intermediate storage center for used solvents. SK receives used solvents from customer facilities and transfers those used solvents from this location to a centralized SK recycling facility. SK also receives clean solvents that have been reclaimed at a centralized SK recycling facility and distributes those clean solvents from this location to customer facilities. Additional business activities related to the leasing and servicing of SK parts cleaning equipment are also conducted at this location.

According to the Waste Analysis Plan, used parts washer solvents received and managed on-site are generated by SK customers in parts degreasing/cleaning machines that may be “sink-on-a-drum” units or larger, vat-like devices. Although SK typically provides these parts degreasing/cleaning machines to customers, the company also provides a solvent and solvent reclamation service for customer-owned parts degreasing/cleaning machines. The majority of SK parts washer solvent is a petroleum distillate solvent, and aqueous based solvents are also utilized to a lesser extent. SK has determined that its used parts washer solvent consists primarily of solvent and/or water, solids (i.e., metal bearing residue), oil, and grease, and that it is regulated as a hazardous waste exhibiting the hazardous waste characteristics associated with the following EPA hazardous waste codes: D001, D004-D011, D018, D019, D021-D030, and D032-D043.

SK’s spent immersion cleaner is a hazardous waste solvent generated by off-site customers when oil, grease and other solids become entrained in the solvent during its use to remove varnish and gum from such things as carburetors, transmissions, and other metal parts. SK describes the waste as a single phased heavy aromatic naphtha-based formulation that is basically unchanged from its product state, but that exceeds the TCLP criteria due primarily to heavy metals and organic contamination that is typical of that found in auto repair shops. Organic contamination may include benzene from gasoline, perchloroethylene and trichloroethylene from specialty cleaning solvents, and methyl ethyl ketone from paint thinners. SK has determined that its spent immersion cleaner is regulated as a hazardous waste exhibiting the toxicity characteristics associated with the following EPA hazardous waste codes: D004-D011, D018, D019, D021-D030, and D032-D043.

Spent dry-cleaning materials generated off-site by contracted SK customers include cartridge filters, powder residue, still residue and still condensate. According to the Waste Analysis Plan, these wastes contain various concentrations of tetrachloroethylene, mineral spirits (petroleum naphtha), trichlorotrifluoroethane and other used products. Dry-cleaning cartridges are constructed of steel, paper, clay and/or carbon, and spent dry-cleaning cartridge filters include these construction materials as well as retained dry-cleaning solvent, oil, grease, and undissolved elements (such as lint and soil). Although the spent cartridges range from dry to wet, SK has determined that the solvent retained in a spent cartridge generally amounts to less than 50% of the total cartridge by weight. Some SK dry-cleaner customers use a mixture of powdered materials instead of a cartridge filter to clean used dry-cleaner solvent. These powdered materials generally consist of diatomaceous earth and carbon, and the spent powder residues include the filter medium as well as retained solvent, lint, soil, oil, and grease. SK has determined that the solvent retained in this filter medium typically comprises between 40 and 50% of the spent powder residue by weight. After filtering undissolved elements from spent dry-cleaning solvents, SK dry cleaner customers distill the spent solvents to remove dissolved materials. These dissolved materials, or still residues, are in liquid or solid form and consist primarily of detergent, oil, grease, vinyl acetate (a sizing compound), water and solvent. In some instances, dry cleaner customers also separate water from the still residues. In these cases, solvent contaminated separator water, or still condensate, is collected in a container that is separate from the container for the remaining still residues, or still bottoms. According to the Waste Analysis Plan, SK has determined that spent dry-cleaning material wastes are regulated as a listed hazardous waste carrying the EPA waste code F002, and as a hazardous waste exhibiting the characteristics associated with the following EPA hazardous waste codes: D001, D004-D011, D018, D019, D021-D030, and D032-D043.

SK's paint waste/used lacquer thinner reclamation program primarily services automobile body repair shops, and paint waste/spent lacquer thinner is generated through various painting operations at customers' locations. According to the Waste Analysis Plan, paint waste and used lacquer thinner is ignitable; it is toxic due to the concentration, before use, of non-halogenated solvents including toluene, xylene, and methyl ethyl ketone; it is toxic due to its concentrations, after use, of trichloroethylene and methyl ethyl ketone; and it may also be toxic due to its concentrations, after use, of heavy metals and/or other TCLP volatile and semi-volatile organic constituents. SK has determined that paint waste/used lacquer thinner is regulated as a listed hazardous waste with the EPA hazardous waste codes F003 and F005, and as a hazardous waste exhibiting the characteristics associated with the following EPA hazardous waste codes: D001, D004-D011, D018, D019, D021-D030, and D032-D043.

In addition to the hazardous wastes described above, the subject facility also accepts waste that is generated at customer facilities from the clean-up of spills or releases of materials that were supplied by SK or from the clean-up of spills or releases of hazardous waste that is generated from materials that were supplied by SK. Spill clean-up wastes may include contaminated soils, contaminated waters (including decontamination rinses), contaminated material used for spill control and clean-up, and contaminated disposable personal protective equipment. Because contamination in a spill clean-up waste originates from hazardous materials that are supplied by SK or from hazardous wastes generated from hazardous materials that are supplied by SK, the hazardous properties associated with the spill clean-up waste is from a known identity and the associated EPA waste codes are the same as those identified for the spilled material. According to the Waste Analysis Plan, SK only accepts spill clean-up waste for management in the on-site permitted storage areas when the waste is generated from an incident that occurred in the presence of a SK employee, or from an incident in which the customer is able to provide an analysis or other method describing the constituents of the spilled or released material. In addition, spill clean-up waste will only be accepted on-site if SK personnel participate in the clean-up activities generating the waste.

#### Facility Classification:

The subject facility has been in operation since May 1, 1976. SK owns this facility and operates it under the NAICS Code 532490 for Other Commercial and Industrial Machinery and Equipment Rental and Leasing, 484220 for Specialized Freight (Except Used Goods) Trucking Local, 484230 for Specialized Freight (Except Used Goods) Trucking Long Distance and 562112 for Hazardous Waste Collection. The facility occupies an approximately 5-acre site that is permitted to receive and store hazardous wastes under the RCRA Hazardous Waste Management Permit Number NCD077840148 R3. Pursuant to the RCRA Permit, SK may store containers of hazardous waste in three permitted container storage areas (CSAs) and in one permitted storage tank (Tank 1). SK also operates this location as a hazardous waste transfer facility where containers of hazardous waste may be held for a period of ten days or less during the normal course of transportation. On January 30, 2022, SK most recently notified as a large quantity generator (LQG) and a treater, storer, or disposer (TSD) of hazardous waste that receives hazardous waste from off-site.

SK generates drum washer sediment from washing/cleaning drums containing used parts washer solvent, waste solvent dumpster sludge, tank bottom sediment, personal protective clothing, spill debris, and sampling debris at the subject facility. The drum washer sediment consists of soils,

oils, grease, water, small amounts of solvent, and some metal parts. According to the Waste Analysis Plan, characterization of branch facility generated wastes is based on SK's knowledge of the waste stream and confirmed through annual waste recharacterization. The drum washer sediment and the tank bottom sediment are derived from the used parts washer solvent, and SK has determined that they are hazardous according to the Toxic Characteristic Leaching Procedure (TCLP) because of heavy metals and other organic TCLP based waste codes. The facility-generated wastes may also exhibit the characteristic of ignitability. Containers of facility generated hazardous wastes are labeled and stored for less than 90 days in the existing permitted CSAs, which are subject to the inspection procedures set forth in the RCRA Permit.

## 9) **Previous Inspection History**

In addition to full-scale RCRA CEIs, NCDEQ conducts routine RCRA Focused Compliance Inspections (FCIs) under the NCDEQ Resident Inspector Program. NCDEQ has conducted an annual RCRA CEI at the subject facility for over thirty years, and the most recent RCRA CEI was conducted on June 16, 2022. According to RCRAInfo, no violations have been noted at this facility since calendar year 2015.

## 10) **Opening Conference**

On October 18, 2022, EPA inspector Laurie Benton DiGaetano, accompanied by NCDEQ inspectors Mark Burnette and Jack Kitchen, arrived at the Safety Kleen Archdale facility at approximately 10:00 a.m. Andrew Tilley, Branch Manager, immediately received the inspectors. The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records.

Please note 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>.

Pursuant to 40 C.F.R. §2.203, the company may assert a business confidentiality claim for information submitted to EPA. The company has not asserted a business confidentiality claim in connection with this CEI.

## 11) **Observations**

### **Facility Access:**

The subject facility includes a Facility Office Building, Warehouse Building, Return and Fill Area, Tank Farm and Truck Station. With the exception of the Facility Office Building, access to the active portion of the facility is controlled through three gates in a six-foot-high chain link fence that is topped with three strands of barbed wire. The inspectors observed the fence and barbed wire. Warning signs appeared to be posted at intervals along the length of the chain link fence, and the security gates appeared to be in working order.

### Warehouse - Permitted Container Storage Areas (CSAs):

Pursuant to the RCRA Permit, SK may accept containers of hazardous waste from off-site and store them in three permitted CSAs inside the 11,700 square foot Warehouse Building. Dumpster sediment, spent immersion cleaner, used antifreeze, and dry-cleaning waste may be stored in the 680 square foot permitted CSA in the southeast corner of the building; spent immersion cleaner, dry-cleaning waste, used antifreeze and spent industrial solvents may be stored in the 1,600 square foot permitted CSA in the northwest corner of the building; and paint waste may be stored in the 1,350 square foot Class 1B permitted CSA in the southwest corner of the building. SK also routinely manages various containers of wastes that are in the course of normal transportation by storing them in these three permitted CSAs for a period of ten days or less as set forth in the transfer facility requirements found in 15A NCAC 13A .0108 [40 C.F.R. § 263.12].

The inspection participants toured CSA 2, which is permitted for the storage of containers holding nonflammable hazardous waste, such as spent immersion cleaner, dry-cleaning waste, used antifreeze and spent industrial solvents. The Waste Analysis Plan states that SK personnel collect containers of spent immersion cleaner from customer facilities and transport them for recycling at a SK recycle center. Although it may be necessary to open these containers to obtain samples for additional analytical testing or to perform additional visual qualitative inspections at the subject facility, they typically remain closed until they reach the SK recycle center.

According to the Waste Analysis Plan, dry-cleaning waste is collected in containers and the containers remain closed until they are received at the recycling center, where they are inspected and/or tested in accordance with that facility's operating permit. The plan states that SK does not require visual inspection of dry cleaner wastes at the customer's site or at the NC facilities due to employee exposure concerns and negligible risk of foreign material contaminating the waste. The plan explains that these wastes are generated within dry-cleaning machines in very controlled environments; that other operations using significant amounts of other materials are not conducted in these environments; and that the dry-cleaning machines do not lend themselves to cross-contamination by other foreign materials. Containers of dry-cleaning waste are ultimately shipped to a SK recycle center or another approved TSDF.

According to SK personnel, the permitted CSA 2 is primarily used to store containers of hazardous waste for a period of ten days or less as set forth in the transfer facility requirements found in 15A NCAC 13A .0108 [40 C.F.R. § 263.12]. The inspectors observed a no smoking sign, fire extinguishers, a fire alarm, an emergency eyewash station, and spill response kits in CSA 2. The inspectors also observed lines painted onto the floor to delineate required aisle spacing for storing containers in five long rows and one short row within this permitted CSA. The following containers were observed in each row:

- Row 1 – In the short row, which was located at the far-right hand corner of this permitted storage area, the inspectors observed one tote of used antifreeze and one tote of sodium hypochlorite. In the far-left corner opposite the short row, the inspectors observed six bins labeled for storing used oil filters. SK personnel stated that each bin can hold the contents of approximately six 55-gallon drums, and that OFR removes the contents of the bins every month and takes the used oil filters off-site.
- Row 2 – In the first long row, which was located next to the short row, the inspectors observed electronic wastes.
- Row 3 – In the next long row, the inspectors observed three wooden pallets, stacked two high. Each of the bottom three pallets held four 55-gallon drums of nonhazardous waste

and each of the top three pallets held electronic waste.

- Row 4 – In the next long row, the inspectors observed three 55-gallon drums of nonhazardous waste.
- Row 5 – In the next long row, the inspectors observed one 35-gallon drum, one 55-gallon drum, and one overpack drum of nonhazardous waste.
- Row 6 – In the final long row, which was located closest to the entrance of this permitted storage area, the inspectors observed four 55-gallon drums of diesel engine oil product, one 55-gallon drum of investigation derived nonhazardous waste groundwater, and one 55-gallon drum of investigation derived waste soil. The drum of investigation derived waste soil was dated October 12, 2022, and it was marked to indicate that the facility was waiting on analytical results for samples taken of the drums contents. Personnel indicated that the labeling on this container would be finalized based on the results of the analytical testing.

#### Warehouse - Permitted Flammable CSA and Associated Satellite Accumulation Area (SAA):

The inspection participants toured the Class 1B permitted CSA, which is permitted for the storage of containers holding flammable hazardous waste, such as paint waste/spent lacquer thinner. According to the Waste Analysis Plan, paint waste and spent lacquer thinners are collected in containers that remain closed at all times during transport and storage. The plan states that these containers are typically not opened at the NC facilities, but that they may be opened from time to time if it is necessary to obtain samples for additional analytical testing or to perform additional visual qualitative inspections.

According to SK personnel, the Class 1B permitted CSA is primarily used to store containers of hazardous waste for a period of ten days or less as set forth in the transfer facility requirements found in 15A NCAC 13A .0108 [40 C.F.R. § 263.12]. The inspectors observed a no smoking sign, fire extinguishers, a fire alarm, an emergency eyewash station, and spill response kits in this area. The inspectors also observed lines painted onto the floor to delineate required aisle spacing for storing containers of hazardous waste in five rows within this permitted CSA. The following containers were observed in each row:

- Row 1 – In the first row, which was located along the wall to the left of the entrance, the inspectors observed two totes of citrus GSR product, one 55-gallon drum of citrus GSR product, seven 55-gallon drums of antifreeze, and two pallets holding 5-gallon containers of ultrakleen spray equipment product solution. No containers of waste were observed in this row.
- Row 2 – In the second row, the inspectors observed one tote of citrus GSR product, thirteen empty 55-gallon drums, and one 55-gallon drum of hazardous waste. The container of hazardous waste was labeled as hazardous waste branch debris, identified as ignitable and toxic, and marked with an accumulation start date of October 17, 2022.
- Row 3 – In the third row, the inspectors observed one 15-gallon container of nonhazardous waste, one 5-gallon container of hazardous waste, and one pallet holding empty 5-gallon containers. Although the 15-gallon container of nonhazardous waste was labeled as hazardous waste sealant/adhesives, a review of the associated waste profile and manifest records verified that the container held nonhazardous waste. SK personnel explained that the generator labeled the container with an inaccurate label, which should have been corrected by the transporter at the time the container was picked up. The 5-gallon container of hazardous waste was labeled hazardous waste paint related material,

identified as ignitable and toxic, and marked with an accumulation start date of October 17, 2022.

- Row 4 – In the fourth row, the inspectors observed two 55-gallon drums of hazardous waste. One drum was labeled hazardous waste solids containing flammable liquids, identified as ignitable and toxic, and marked with an accumulation start date of October 14, 2022. The second drum was labeled hazardous waste methanol mixture, identified as ignitable, and marked with an accumulation start date of October 14, 2022.
- Row 5 – In the fifth row, the inspectors observed two 55-gallon drums of waste. One drum was labeled hazardous waste flammable liquid, identified as ignitable, and marked with an accumulation start date of October 14, 2022. The second drum was labeled universal waste aerosols and marked with an accumulation start date of October 14, 2022.
- Along wall next to spill kit – The inspectors observed one 35-gallon drum in a SAA located along the wall next to the spill kit in this area. The drum was labeled as hazardous waste aerosols and identified as flammable gas.

#### Warehouse - Oil Retains SAA:

SK manages a SAA in the Warehouse for managing hazardous waste oil retains that are generated when oil retain samples are purged. SK personnel explained that oil samples are collected from each customer and retained on-site for ninety days. After ninety days, the oil retain samples are accumulated as hazardous waste in a SAA. The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste combustible liquid retain/oil samples.

#### Return and Fill Area:

The facility's Return and Fill Area is a long loading dock, which is covered by a roof and enclosed on two sides. The area is equipped with a concrete floor and concrete curbing that serves as secondary containment beneath a metal floor grate. The concrete floor is sloped to a sump, which is equipped with a pump to remove any spilled material and transfer it to Tank 1. According to the Permit application, an epoxy and/or polyurethane coating has been applied to the surface of the concrete floor and curbing to prevent the migration of spilled waste material. The inspectors observed a "no smoking" sign, fire extinguishers, emergency eyewash station, spill response kit, and emergency alarm for summoning outside help in this area.

SK personnel explained that drivers return from customer locations each afternoon bringing trucks full of used parts washer solvent and other wastes. First, the full truck is brought to the permitted CSAs so that any containers that are not holding used parts washer solvent can be offloaded for holding under the 10-day transfer standards or for storage under the RCRA Permit. Then the truck is brought to the Return and Fill Area where the containers of used parts washer solvent are offloaded and staged for processing in the drum washer/dumpster units. Each container of used parts washer solvent is manually opened and placed inside one of two drum washer/dumpster units in the Return and Fill Area. These units are specifically designed to empty a container and accumulate its contents in a collection reservoir. A recirculation pump lifts spent solvent from the collection reservoir and injects it inside the open-ended drum while two rotary brushes rotate the container and remove residuals from both its inside and outside surfaces.

When an empty container is removed from the drum washer/dumpster unit, it may either be staged in the Return and Fill Area for reuse or be placed onto a separate drum rinsing (i.e., drum spritzer) unit where a final rinse of SK's premium solvent is injected inside the inverted, open, empty container. In order to minimize the possibility of emissions and the chance of spills, the drum rinsing unit drain is hard piped directly to the drum washer/dumpster unit where liquids can accumulate in the collection reservoir. Used parts washer solvent is pumped from the collection reservoir into the permitted hazardous waste storage tank (Tank 1). Any material that is spilled while loading, unloading, or processing liquids in the Return and Fill Area is captured in the secondary containment and is also pumped to Tank 1.

Clean, empty containers that have been processed in the drum washer/dumpster units are staged along the wall in the Return and Fill Area so that they can be filled with clean solvent and loaded onto the empty trucks for delivery back to the customer locations. According to facility personnel, containers of used parts washer solvent arriving on the final service delivery of the day are processed in the drum washer/dumpster units, and then staged along the wall where they remain empty overnight. These empty containers are filled with clean solvent the following morning for subsequent delivery to customer locations.

SK manages one SAA in the Return and Fill Area for accumulating hazardous waste branch debris. The inspectors observed one 55-gallon drum in this SAA. The drum was closed with a latched lid; it was labeled as hazardous waste branch debris; and it was identified with a flammable liquid DOT hazard placard.

The inspectors observed the pump and the piping used to transfer used parts washer solvent from the Return and Fill Area to Tank 1; and observed metal tags that identify the pump and connections in this line as being subject to Subpart BB of RCRA.

#### Tank Farm and Permitted Storage Tank (Tank 1):

The Tank Farm houses seven above-ground storage tanks within a concrete secondary containment structure. Tank 1, a 20,000-gallon vertical steel tank, is the only one of the seven tanks used and permitted to store hazardous waste used parts washer solvent under the RCRA Permit. Tank 2 is a 20,000-gallon vertical steel tank used to store clean parts washer solvent that has been reclaimed at a centralized SK recycling facility. Tank 3 is a 20,000-gallon tank used to store a mixture of water and used oil, and Tanks 4 and 6 are 20,000-gallon tanks used to store used oil. Tanks 5A and 5B are out of service but were historically used to store solvent products. According to the RCRA Permit Application, SK may use these two interconnected 2,000-gallon tanks to store petroleum in the future. The inspectors observed these tanks, which were labeled and appeared to be in good condition.

Bulk shipments of materials stored in the five active storage tanks are loaded and unloaded at the Truck Station, a concrete-paved area located adjacent to the Tank Farm. The piping connections used to transfer material between storage tanks and tanker trucks are housed in three storage tank access container units located within the Tank Farm containment area and adjacent to the Truck Station. Precipitation and potential spills in the Truck Station are contained and collected in a collection sump at the station, and the sump is equipped with a pump that can be used to transfer collected liquid into a storage tank or a tanker truck. Used solvent in Tank 1 is periodically transferred via tanker truck to a SK owned/operated recycle center.

SK manages one SAA in the Tank Farm Area for accumulating hazardous waste branch debris. The inspectors observed one 55-gallon drum in this SAA. The drum was closed with a latched lid; it was labeled hazardous waste branch debris; and it was identified with a flammable liquid DOT hazard placard.

#### Inspection Records:

The inspectors reviewed SK's available records of inspections since the NCDEQ's most recent focused compliance inspection, which was conducted on September 19, 2022. The records include the date and time of each inspection and the name and signature of the employee conducting the inspection.

SK personnel record observations of daily inspections at each CSA on an inspection checklist and maintains those records on an electronic recordkeeping system. The checklists are identical for each of the three permitted CSAs and include specific spaces to document observations of: container placement and stacking; sealing containers; labeling containers; container integrity; pallets; doors; base, foundation, roof; berms/racks; site generated waste; exit signs; aisle space; containment area; sumps; loading/unloading area; communication and alarm system; storage capacity; bonding and grounding; pumps; inventory age; SAA containers; and spill equipment. The electronic recordkeeping system did not include records of daily inspections conducted in CSA2 between September 24 and 27, 2022 and between October 5 and 12, 2022. However, SK personnel located paper copies of those inspection records and provided them to the inspectors for review.

SK personnel record observations of daily inspections at the Return and Fill Area on an inspection checklist and maintains those records on an electronic recordkeeping system. The checklist includes specific spaces to document observations of pump seals; pump motors; fittings; valves; hose connections and fitting; hose body; lid fusible link and lid hinge assembly for clam shell unit types; gaskets and lid/slide assembly for sliding lid unit types; seals and door/roll-up assembly for roll-up door unit types; wet dumpster/drum washer; secondary containment; loading/unloading area; SAA containers; ventilation fan; and site generated waste.

SK personnel also record observations of daily inspections of the Tank System on an inspection checklist and maintains those records on an electronic recordkeeping system. The checklist includes specific spaces to document observations of tanks; pipes/piping support; valves; fittings/hose connections; liquid level and secondary containment; dike drain valves; double walled interstitial sumps; bonding and grounding; transfer equipment/pump and pump motors; communication and alarms; SAA containers; manways/hatches/openings; pressure relief valves; "hazardous waste" labels; "out of service" labels; content labels; monitoring equipment/level sensors/overfill prevention equipment; loading/unloading areas; tank system safety; connection box/drip trays and buckets; site generated waste; and spill equipment.

SK personnel record observations of weekly inspections of the site safety and security equipment on an inspection checklist and maintains those records on an electronic recordkeeping system. The checklist includes specific spaces to document observations of fences; gates/doors; warning signs; exit signs; exits/evacuation routes; lighting system; emergency lighting; accessibility, adequate supply, and condition of safety equipment; accessibility, adequate supply, and

condition of breathing apparatus; emergency eyewash; emergency shower; communication; fire extinguisher; alarm; and fire equipment.

RCRA Air Monitoring under Subparts AA and BB:

RCRA Subparts AA and BB standards apply for the management of waste with organic concentrations of at least 10 parts per million by weight (ppmw) (10%). SK has determined that Subpart AA standards are not applicable at this location because the facility does not perform distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping activities onsite. SK has also determined that Subpart BB standards are applicable at this location, however, because all hazardous waste managed in Tank 1 is assumed to contain between 80% and 100% organics. Facility records indicate that used parts washer solvent managed in Tank 1 is defined as a heavy liquid because the total concentration of contaminants with vapor pressure >0.3 kPa is 4164, or 0.42% and the total concentration of organic components with vapor pressure >0.3 kPa at 20° C is less than 20% by weight of the total process stream.

SK has identified pumps, valves, flanges, pressure relief devices and one open-ended tanker truck loading/unloading line, which is equipped with a flanged CAM lock, as ancillary equipment to Tank 1 that may contain or contact hazardous waste with organic concentrations of at least 10% ppmw and are in heavy liquid service. The inspectors reviewed records of visual inspections conducted on the identified ancillary equipment since the NCDEQ's most recent focused compliance inspection, which was conducted on September 19, 2022. In addition, the inspectors reviewed the record of annual inspection of the Tank 1 fixed roof and closure devices, which was conducted on May 10, 2022.

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 January 19, 2022. 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; and includes an evacuation plan for personnel. The evacuation plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

The contingency plan includes a list of all emergency fire extinguishing systems, communications and alarm systems, eye wash stations and emergency shower, spill response equipment, emergency and personal protective equipment, and first aid kits at the facility. This list also includes the location and a physical description of each piece of emergency equipment, and a brief outline of its capabilities. The plan also lists the names and emergency telephone numbers for the person identified as the primary emergency coordinator, as well as for the persons identified as the first and second alternate emergency coordinators. Arrangements agreed to with the local police, fire, and other emergency response teams, and information provided to the High Point Regional Hospital are described in the plan.

A copy of the Contingency Plan was sent to the Randolph County Sheriff's Department, the Randolph County Manager, the Guilford-Randolph Fire Department, the Archdale Police Department, the High Point Medical Center, and Clean Harbors on January 20, 2017. An

updated emergency contact list was emailed to the emergency response entities on January 19, 2022, when the plan was most recently revised to update the list of Emergency Coordinators.

Training Records:

SK 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 the most recent employee hazardous waste training which was completed by twelve employees on March 2, 2022.

Waste Manifest Records:

The inspectors reviewed hazardous waste manifest records for containers of hazardous waste currently being managed in the permitted CSAs under the transfer facility requirements. None of these containers had exceeded the ten-day limit for a transfer facility.

The inspectors also reviewed records of hazardous waste shipments of site-generated waste sent off-site for treatment, storage or disposal. The facility ships D008/D018/D039/D040 waste combustible liquid (oil retains) to SK (KYD053348108) for fuel blending in Smithfield, Kentucky; D001/D006/D007/D008/D018/D039/D040 waste combustible liquid (petroleum naphtha) to SK (SCD077995488) for solvents recovery in Lexington, South Carolina; and D001/D004/D005/D006/D007/D008/D009/D010/D011/D018/D019/D021-D043/F002/F003/F005 waste flammable liquids (petroleum distillates) to Clean Harbors Deerfield (TXD055141378) for incineration in La Porte, Texas.

**12) Closing Conference**

The inspectors conducted the exit meeting with Andrew Tilley. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

**13) Signatures**

**LAURIE  
DIGAETANO**

Digitally signed by LAURIE  
DIGAETANO

Date: 2022.11.30 15:19:42 -05'00'

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Laurie Benton DiGaetano  
Senior Enforcement and Compliance Specialist

**Concurrence**

**ARACELI CHAVEZ**

Digitally signed by ARACELI  
CHAVEZ

Date: 2022.11.30 15:55:27 -05'00'

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Araceli B. Chavez  
RCRA Enforcement Section