

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
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2) Facility Information

Clean Harbors Reidsville, LLC
208 Watlington Industrial Drive
Reidsville, North Carolina, 27320

EPA ID#: NCD000648451
NAICS #: 562211 – Hazardous Waste
Treatment and Disposal

3) Responsible Officials

Douglas Greer
Facility General Manager
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4) Inspection Participants

Douglas Greer, Clean Harbors
Reidsville, LLC
Todd Blake, Clean Harbors Reidsville,
LLC

Mark Burnette, NCDEQ
Robert Nelms, NCDEQ
Kayla Acosta, USEPA

5) Date of Inspection

October 18, 2023 at 9:30 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; The North Carolina Solid Waste Management Law, N.C.G.S. § § 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119; and State of North Carolina Division of Waste Management Hazardous Waste Management Permit No. NCD000648451-R3.

Pursuant to 15A NCAC 13A .0102(b) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) 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 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 Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA,

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.

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”).

Pursuant to 15A NCAC 13A .0107(a) [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 Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 15A NCAC 13A .0119(a) [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.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Clean Harbors Reidsville, LLC’s (known hereinafter as CHR or “facility”) compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit (Permit No. NCD000648451-R3), the applicable requirements of RCRA, and the corresponding North Carolina regulations. This was an EPA lead inspection.

8) Facility Description

CHR is a subsidiary of Clean Harbors, a provider of environmental and industrial services. According to Clean Harbor’s website, the company was founded in 1980 and serves a variety of industries including the chemical industry, manufacturing industry, and government agencies. Services that the company provides include end-to-end hazardous waste management, emergency spill response, industrial cleaning and maintenance, and recycling services. The company is also a used oil re-refiner, used oil recycler, and parts washer and environmental services provider through their subsidiary Safety-Kleen. Clean Harbors operates in several locations throughout the United States including Puerto Rico, Canada, and Mexico.

CHR in Reidsville, N.C. began operations in 1980. The CHR property is approximately 24 acres and consists of two parcels. The parcel to the north contains several buildings dedicated to the RCRA permitted activities. The parcel to the south is the location of the 10-day transfer facility and used for storage of equipment, containers, and trailers. CHR operates their day shift Monday through Friday from 6:00 AM to 5:00 PM and operates their night shift Sunday through Friday from 9:00 PM to 7:00 AM. The facility has approximately 65 employees. The facility maintains 24-hour security and has controlled access and a perimeter fence with signage posted at least every 50 feet along the fence which displays “Danger—Unauthorized Personnel Keep Out” as required by the facility permit.

The facility is located in Reidsville, N.C. and is a hazardous waste treatment and storage facility that also processes and stores non-hazardous waste before sending both hazardous and non-

hazardous waste to the appropriate designated disposal facility. Types of waste handled by the facility include ignitable, corrosive, and toxic hazardous wastes; flammable, non-flammable and toxic gases; and other hazardous and non-hazardous materials such as paint, pesticides, gasoline, spent solvents, used oil, helium and pool chemicals. Compatible liquid waste streams are consolidated and pumped into a tanker truck and/or railcar for transport to a treatment, recycling, or disposal facility. Hazardous and non-hazardous materials packaged in labpacks that are shipped to the facility from commercial, industrial and academic laboratories, retail stores, and household collection events are unpacked and re-containerized with compatible materials. Solid hazardous and non-hazardous wastes may also be re-containerized, bulked, or consolidated into truckload or railcar quantities for final shipment to an approved disposal facility. In some cases, wastes may be shredded and/or solidified before shipping off-site. Future plans for the facility include construction of new stabilization and tank storage areas.

The hazardous waste permit describes a number of hazardous waste storage areas and treatment methods. Within Building 2, hazardous waste storage is permitted in seven (7) container storage bins, in two (2) northeast container storage areas (North and South), and in the warehouse floor area (solids and labpacks only). Hazardous waste storage is also permitted in the drum bulking area within Building 3, in ten (10) truck bays within Building 5, in two (2) container storage areas within Building 6, in 12 truck bays within Building 7, and in 11 truck bays within Building 8. Container bulking can include placing smaller containers of compatible/ similar wastes into larger containers, or by pumping waste using a portable pump and hose and submerged fill pipe into the receiving bulk container, tanker, or railcar. Although Part VIII ("Organic Air Emissions Requirements for Process Vents and Equipment Leaks") of the HW Permit states that CHR has no units to which the Organic Air Emissions Requirements of 40 C.F.R. 264, Subpart AA (for process vents), and/or Subpart BB (for equipment leaks) applies, please note that the HW Permit also states that all pumps, piping/hoses, fittings/connections, closure devices, etc., used in this operation must be inspected and monitored to detect leaks from containers and equipment pursuant to Subpart BB and CC.

The hazardous waste treatment methods listed in the HW Permit Part A application and described in Section D of the HW Permit Part B application include chemical oxidation, detoxification, acid digestion, solidification, encapsulation, and shredding of small containers.

CHR also operates a 10-day transfer facility for hazardous and non-hazardous waste and also operates as a LQG of hazardous waste. The facility generates hazardous and non-hazardous waste materials which are treated on-site or shipped off-site to another permitted treatment, storage, or disposal facility (TSDF). Wastes generated on-site include: wastes originally received from other generators, labpack quantities (liquids and solids) that CHR has bulked in standard sized drums for on-site or off-site treatment or off-site disposal, stabilized or solidified waste streams to be landfilled off-site at a permitted facility, potentially contaminated rainwater/precipitation collected from secondary containment areas, laboratory wastes generated from analyzing samples, and contaminated personal protective equipment.

Waste Pre-acceptance: Prior to initiating a shipment of waste to CHR, a potential customer must provide CHR with a description of the process generating each individual waste stream, along with pertinent chemical and physical data, a representative sample (if requested), and other supporting documentation [i.e., Safety Data Sheets, sample analysis, and Land Disposal Restriction (LDR) form]. This information is used to determine if the waste can be accepted for

on-site treatment or storage or if it must be rejected based on the conditions or limitations in existing permits, on applicable LDR conditions, on available off-site management options or on its compatibility with other wastes being treated and stored at the facility. This pre-acceptance evaluation is repeated when greater than one year has passed since the evaluation was completed; when a generator notifies CH that the process generating the waste has changed; or when the results of inspection or analyses indicate that the waste received at the facility does not match the identity of the waste designated in the pre-acceptance description or on the accompanying manifest.

Waste Acceptance: Upon arrival, every vehicle carrying waste must stop to check in with CHR personnel on duty, who will provide instructions on where to proceed within the facility. All unloading operations take place in designated unloading zones. Arriving shipments are visually inspected to ensure that the manifest accurately describes the contents of the vehicle (i.e. truck weight or drum count), and that the waste identity conforms to the description provided on the manifest and the corresponding waste profile. The appropriate management area for each container is selected during the waste identification and verification process based on whether or not the container holds free liquids, an ignitable or reactive waste, and whether the contents of the container are incompatible with any other materials.

Containers of waste that are received and are to be shipped to an off-site facility as-is for further management (treatment, disposal, and recovery) are not opened, sampled or analyzed on-site. However, CHR conducts sampling of every bulk shipment of solid and liquid waste (with the exception of lab-pack waste and consumer products) from incoming shipments of containerized waste to be bulked, consolidated, or treated on-site. To confirm that the parameters match the associated waste profile, samples are subject to a fingerprint screen analysis for physical description, pH, water reactivity, reactive sulfide screen, ignitability, reactive cyanides screen, oxidizer screen, and radioactivity screen. In addition, material cannot be transferred from any incoming bulk or containerized load into a rail car or tanker until CHR performs a compatibility evaluation on those materials. Received waste remains in its compatible shipping container until it is sampled, emptied, or bulked.

For arriving shipments that require container sampling, CHR selects a minimum of 10 percent of the containers under each waste stream profile. Up to 20 samples related to a single waste profile sent by the same generator may be composited for the initial analysis. If samples taken from 10 percent of the containers uncover significant discrepancies, such as the material approved is a solid and liquids are found, all remaining containers are opened and inspected from that waste stream. Certain waste streams that are not amenable to sampling (e.g. batteries or large debris) are not sampled, but they are visually inspected in the shipping container. Upon receipt, CHR personnel must verify the identity of waste streams characterized as reactive on the manifest and profile on a case-by-case basis. Wastes received in labpacks from facilities such as laboratories, schools, etc. are exempt from routine sampling procedures. According to facility representatives, 90% of the incoming waste at the facility are labpacks.

CHR first notified of its regulated waste activities on March 12, 1990. The facility then notified as a LQG of hazardous waste on March 31, 1992, and notified as a TSDF on December 14, 1998. The most recent notification as a LQG and TSDF was submitted on January 20, 2022. The facility generates a variety of waste streams as a result of their permitted activities. These waste streams and associated waste codes include:

Type of Wastes	Waste Codes
Ignitable Wastes	D001
Corrosive Wastes	D002
Reactive Wastes	D003
Toxic Wastes	D004 D005 D006 D007 D008 D009 D010 D011 D012 D013 D014 D015 D016 D017 D018 D019 D020 D021 D022 D023 D024 D025 D026 D027 D028 D029 D030 D031 D032 D033 D034 D035 D036 D037 D038 D039 D040 D041 D042 D043
Hazardous Wastes from Non-specific Sources	F001 F002 F003 F004 F005 F006 F019
Hazardous Wastes from Specific Sources	K062
Discarded Commercial Chemical Products: Acutely Toxic	P001 P002 P003 P004 P005 P007 P008 P011 P012 P015 P020 P022 P023 P028 P030 P037 P039 P040 P041 P042 P043 P045 P046 P047 P048 P050 P051 P057 P058 P059 P066 P068 P070 P075 P077 P081 P082 P087 P088 P094 P095 P097 P098 P102 P105 P106 P109 P115 P116 P119 P120 P123 P188 P204
Discarded Commercial Chemical Products: Toxic	U001 U002 U003 U005 U006 U007 U008 U009 U010 U011 U012 U016 U019 U021 U022 U026 U027 U031 U034 U035 U036 U037 U041 U043 U044 U045 U047 U048 U050 U051 U052 U053 U055 U056 U057 U058 U059 U060 U061 U062 U066 U067 U069 U070 U071 U072 U077 U078 U079 U080 U081 U085 U087 U088 U089 U090 U092 U097 U102 U103 U105 U106 U107 U108 U112 U113 U114 U117 U118 U119 U122 U123 U124 U125 U127 U128 U129 U130 U131 U132 U133 U134 U136 U138 U140 U141 U142 U144 U147 U148 U150 U151 U152 U154 U156 U158 U159 U160 U161 U162 U164 U165 U169 U170 U171 U182 U185 U187 U188 U191 U192 U196 U197 U200 U201 U203 U204 U205 U206 U208 U209 U210 U211 U213 U218 U219 U220 U221 U222 U223 U225 U226 U227 U228 U234 U236 U237 U238 U239 U240 U244 U246 U247 U248 U249 U279 U328 U353 U359 U404 U409 U411

Synthetic Minor Air Permit: The facility has a Synthetic Minor Air Permit from NCDEQ, permit No. 06898R0. The permit describes several air emission control systems the facility has for the various operations. This includes carbon absorption system for the labpack consolidation operation, a vapor balance system for rail tanker loading operations, and a carbon scrubber and pleated filter system for the miscellaneous unit container shredder.

RCRA Permit: NCDEQ issued a Hazardous Waste Management Permit on September 20, 2017. The permit expired on September 20, 2022, and is currently in the renewal process. The maximum total container storage capacity for the facility is 923,822 gallons, which includes existing and proposed units. Maximum constructed capacity is 619,902 gallons and proposed capacity is 303,920 gallons. Permitted storage areas and maximum storage capacities are listed below:

Building 2 Storage Area	Maximum Storage Capacity	Wastes Typically Stored
Bin 1	11,220 Gallons (204 55-gallon drums or equivalent)	Flammables
Bin 2	11,220 Gallons (204 55-gallon drums or equivalent)	Flammables
Bin 3	11,220 Gallons (204 55-gallon drums or equivalent)	Flammables
Bin 4	11,220 Gallons (204 55-gallon drums or equivalent)	Flammables
Bin 5	11,220 Gallons (204 55-gallon drums or equivalent)	Flammables/ Alkalines
Bin 6	11,220 Gallons (204 55-gallon drums or equivalent)	Flammables/ Acids
Bin 7	11,220 Gallons (204 55-gallon drums or equivalent)	Flammables/ PCBs
N/E North (A-Rows)	15,400 Gallons (280 55-gallon drums or equivalent)	Oxidizers
N/E South (P-Rows)	38,720 Gallons (704 55-gallon drums or equivalent)	Alkalines/Poisons

Building 2 Warehouse Floor Area	Maximum Storage Capacity	Wastes Typically Stored
LP (Labpack) Rows 1-20	44,000 Gallons (800 55-gallon drums or equivalent)	Solids and Labpacks
Receiving	70,400 Gallons (1280 55-gallon drums or equivalent)	Solids and Labpacks
Shipping	101,200 Gallons (1840 55-gallon drums or equivalent)	Solids and Labpacks

Building 3	Maximum Storage Capacity
Waste storage and drum pumping/bulking or de- packing material for consolidation	38,152 Gallons
Building 5 Loading/ Unloading Docks	Maximum Storage Capacity
Secondary containment for trailers loaded with drums and tanker trailers.	60,000 Gallons
Building 6	Maximum Storage Capacity

Waste container staging, storage, de-packing, consolidation, bulking, and treatment and repackaging for further offsite treatment and/or disposal. Separated into two areas (Area 1 and Area 2).	14,850 Gallons Area 1 (8,250 Gallons) Area 2 (6,600 Gallons)
Building 7 Trailer Containment Building	Maximum Storage Capacity
Trailer and container storage and waste consolidation	72,000 Gallons
Building 8 Trailer Containment Building	Maximum Storage Capacity
Trailer and container storage and waste consolidation	86,640 Gallons

9) **Previous Inspection History**

NCDEQ has conducted seven (7) RCRA CEIs at the subject facility between 2018 and 2023 and found no violations during those inspections. NCDEQ conducts monthly focused compliance inspections and annual CEIs to help the facility maintain compliance with their permit and the state and federal RCRA regulations.

10) **Opening Conference**

On October 18, 2023, EPA inspector Kayla Acosta, accompanied by NCDEQ inspectors Mark Burnette, NCDEQ and Robert Nelms, NCDEQ, arrived at CHR at approximately 9:30 AM. Douglas Greer, Facility General Manager, immediately received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit during the opening conference.

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.

Douglas Greer 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. During the facility tour, the inspectors were joined by Todd Blake, Sr. Environmental Compliance Manager for Clean Harbors.

11) Inspection Observations

Building 1:

Building 1 consists of administrative offices, the analytical laboratory, and an attached maintenance area on the opposite side of the building (viewed later on during the facility tour). The laboratory is used for fingerprint screening analysis of incoming waste that will be managed at the facility. Samples are screened for BTUs, flash point, and pH. The laboratory contains a satellite accumulation area (SAA) for hazardous waste. The inspectors observed the following hazardous waste:

- Two (2) 5-gallon containers of labeled “Lab Samples - Acid Flammable (Photo 1 and 2). The containers were both closed, labeled with the words “Hazardous Waste”, and marked with a flammable liquid placard to indicate the hazard of the contents.

Building 2:

Building 2 is used for staging of inbound and outbound wastes (trailer loads) towards the center of the enclosed building. There is also a caged area within Building 2 for DEA regulated wastes which was empty at the time of the inspection. There is a floor area dedicated to solid wastes and labpacks organized by 20 rows (LP-1 to LP-20) with acids and bases segregated. Flammable wastes are segregated into 7 container storage areas (bins) and are separated by 6-inch-high curbs. Bins 1-4 are dedicated to flammable waste only while Bin 5 is for flammables/ alkaline waste, Bin 6 is for flammable/ acid waste, and Bin 7 is for flammables/ PCBs. The Northeast side of the building is a container storage area for oxidizer wastes (A-rows) and the southeast container storage area is for alkaline/ poison wastes (P-rows). Containers holding waste vary in size from 5-gallon containers to cubic yard-size boxes and 250-gallon totes. Most Containers are stacked on pallets. Containers that are 30-gallons in size or more were not stacked more than two (2) containers high as per the permit condition for management of containers. Adequate aisle space was observed in all container storage areas and the concrete floors contained no visible cracks or holes.

All hazardous waste containers were labeled “Hazardous Waste”, properly closed, marked with an indication of the hazard of contents, and dated (Photos 3-11). Containers storing universal waste batteries and lamps were closed, labeled “Universal Waste”, and dated. Each container storage area was compliant with the maximum storage capacities listed in the permit and on page 6 of this inspection report with the number of 55-gallon drums (or equivalent) observed to be well below the maximum allowable number. The inspectors counted the below number of containers (most stacked on pallets).

	Cubic Yard Boxes (220- gallons)	250- gallon Totes	60-gallon Drums	55- gallon Drums	30-gallon Drums	5-gallon Containers
	149	7	14	559	6	145
Total in Gallons	32780	1750	840	30745	60	725
					Overall Total in Gallons	66900

Building 5:

Building 5 is a tanker storage area with two roofed containment bays (north and south) and a central loading/ unloading dock for staging containers that are either unloaded and moved to adjacent buildings or loaded to be shipped offsite. Each bay entrance has a containment curb and ramp that slopes toward a sump adjacent to the dock. The largest container for this building would be a 7,000-gallon tanker trailer. The secondary containment is designed to accommodate this volume. Containers may be stored inside trailers parked in the bays or stored directly on the bay floors, which provide containment in excess of 10 percent of the drum volume of a trailer. The maximum storage capacity in this building is 60,000 gallons. At the time of the inspection, no hazardous waste was observed in Building 5.

Rail Spur:

According to the facility representatives, three (3) 25,000-gallon capacity railcars were being used to bring in product solvent from Safety-Kleen which would be unloaded and distributed to other facilities. No hazardous waste was observed in this area (Photo 12).

South Yard/ 10-Day Transfer Facility:

The 10-day hazardous waste transfer facility is located south of the rail spur and used for storage of equipment, containers, and trailers (Photos 13-16). The transfer facility is also secured with a perimeter fence and signage that reads “Danger—Unauthorized Personnel Keep Out”. Trailer’s storing waste in the 10-day transfer facility are tracked using trailer numbers and Clean Harbor’s WIN Web System. The online system tracks when waste enters the facility and when it is shipped out, alerting management when trailers stored at the transfer facility are approaching the 10-day storage limit. The inspectors recorded three (3) trailer numbers to review in the WIN Web System (#6479, #6406, #320369) in order to verify that waste has not been stored past the 10-day timeframe. All three trailers were compliant with the 10-day accumulation timeframe.

Building 3:

Building 3 is an existing building utilized for waste storage and drum pumping/bulking or de-packing material for consolidation. The concrete floor surface has 6" high curbs for secondary containment and is free from cracks or gaps. All hazardous waste containers were labeled “Hazardous Waste”, properly closed, marked with an indication of the hazard of contents, and dated (Photos 17-20). The inspectors counted the below number of containers (most stacked on pallets), which appeared to be compliant with the maximum storage capacity: 38,152 gallons.

	Cubic Yard Boxes	Super Sacks	60-gallon Drums	55-gallon Drums	30-gallon Drums	5-gallon Containers
	20	4	21	74	1	160
Total in Gallons	4400	1056	1260	4070	0	800
					Overall Total in Gallons	11586

Building 6—Container Shredder-Miscellaneous Unit:

CHR operates a hazardous waste container shredder, a permitted miscellaneous unit. The shredder is designed to process, but not store, containerized waste. The process uses mechanical units and fabricated components to reduce the particle size of waste(s) and to segregate liquids and solids. Operators use information gathered during waste profile acceptance procedures to identify waste materials that are amenable to the shredding process. Incompatible waste materials may not be processed simultaneously, or in sequence, and the unit must be decontaminated between process runs of incompatible waste materials. The unit must also be decontaminated prior to processing non-RCRA waste. When only non-listed RCRA regulated material has been processed in the shredder, decontamination is confirmed by analytical testing of samples taken from the final rinse water. When listed and non-listed material have both been processed in the shredder, the shredder must be decontaminated to the closure specifications.

The container shredder is inspected daily for leaks, spills, and container condition (free of gaps and cracks). emergency equipment, including the fire suppression system, is inspected on a weekly basis. The entire shredder area, including the shredding system, is protected by an Ansul foam or dry chemical fire suppression system. Should a fire develop, automatic sensors trigger the system, and remote pull stations can be activated. The container shredder was not operating at the time of the inspection. No hazardous waste was observed in this area.

Non-Hazardous Waste Shredder:

The non-hazardous waste shredder is used to process and consolidate non-hazardous waste which is then solidified and sent to a landfill for disposal. No hazardous waste was observed in this area.

Building 7:

Building 7 is a roofed structure with bays used for trailer and container storage and waste consolidation. Building 7 shares a loading dock with the adjacent Building 8 used for staging, loading, unloading, and consolidation. Building 7 has 12 containment bays with a maximum storage capacity of 72,000 gallons. Containers may be stored inside trailers parked in the bays or stored directly on the bay floors, which provide containment of more than 10% of the drum volume of a trailer. The inspectors observed electronic waste stored in Building 7 (Photo 21). No hazardous waste was observed in Building 7.

Building 8:

Building 8 is a roofed structure adjacent to Building 7. It contains bays used for trailer and container storage and waste consolidation. Containment Building 8 has 11 containment bays with a maximum storage capacity of 86,640 gallons. Just like Building 7, containers may be stored inside trailers parked in the bays or stored directly on the bay floors, which provide containment of more than 10% of the drum volume of a trailer. The inspectors observed the following hazardous waste with a total storage capacity of 14,790 gallons (Photos 22-25):

- One (1) 5,500-gallon tanker containing hazardous waste. The tanker was labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated.
- One (1) 7,600-gallon tanker containing hazardous waste. The tanker was labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated.
- Five (5) 250-gallon totes containing hazardous waste. The totes were labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated.
- Six (6) 55-gallon containers of hazardous waste. The containers were labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated.
- Three (3) 30-gallon containers of hazardous waste. The containers were labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated.
- Two (2) 10-gallon containers of hazardous waste. The containers were labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated.

Other Side of Building 1—Maintenance:

The other side of Building 1 was inspected last. It stores electronic waste and scrap metal. No hazardous waste was observed here.

Emergency Equipment:

Each building and permitted area were equipped with fire control equipment, spill kits, fire extinguishers, and alarm systems. Emergency contact information and evacuation maps are posted in each building. The facility also maintains PPE for emergency response. Emergency and safety equipment are inspected on a weekly basis.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

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 September 20, 2021. 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. Douglas Greer 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 Rockingham County Emergency Services on September 1, 2023; Reidsville Police Department on September 7, 2023; Annie Penn Hospital on September 6, 2023; Reidsville Fire Chief on September 7, 2023; and Clean Harbors (Emergency Response) on September 6, 2023.

The quick reference guide 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 training for Lauren Greer, Douglas Greer, Keisha Brown, and Grace Ann Schuster. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

CHR uses an online training database called Oracle which provides a description of the type and amount of both introductory and continuing training to be given to employees based on their position descriptions. The inspectors reviewed records of employee hazardous waste training completed in 2022 and 2023.

Waste Manifest and Land Disposal Restriction (LDR) Records:

In-bound and out-bound manifests and LDRs were reviewed through CHR's WIN Web System. Manifests dating back to before 2020 are stored in the online database and the facility keeps hardcopies onsite. Hazardous waste is shipped to either Clean Harbors Deer Park LLC (TXD055141378) in LaPorte, TX or Clean Harbors El Dorado LLC (ARD069748192) in El Dorado, AR. All manifests reviewed were free of errors.

Daily and Weekly Inspection Records:

CHR uses the online WIN Web system to record daily and weekly inspections pursuant to inspection schedule defined in the RCRA permit. For hazardous waste container inspections, the checklist form includes items to inspect such as evidence of leaks, spills, or damage, cracks or damage to secondary containment, corrosion, bulging containers open containers, container

labeling, and aisle space. Last daily inspection was conducted today 10/18/2023. Inspections were reviewed from 2020-2023 through the online database and no issues were found.

Daily Inspections include (but not limited to) perimeter fences, gates, signage, container storage areas in Buildings 1,2,3,5,6,7,8, and the laboratory, consolidating and bulking areas, secondary containment, aisle space, loading/ unloading areas, emergency and equipment.

Weekly Inspections include (but not limited to): PPE, sprinkler systems, fire extinguishers, first-aid kits, emergency shower and eyewash stations.

Electronic Waste:

Electronic waste is shipped to Powerhouse Recycling. The last shipment was on 10/17/2023.

Waste Minimization Plan:

CHR's waste minimization plan was available for review and last certified on 01/23/2023.

Financial Assurance:

Financial assurance documentation was reviewed. Documents reviewed included a Certificate of Insurance (Liability Coverage) Policy No. PRE E603235 02 issued by Great American Insurance Company with the policy period of November 1, 2022 through November 1, 2023 and the Certificate of Insurance for Closure or Post-closure Care. It appears that CHR's financial assurance is up to date and compliant.

Hazardous Waste Shredder Air Monitoring:

Pursuant to the facility's synthetic minor permit, data is collected from the carbon vessel readings of the emissions control device for the shredder unit each time it is operating. The shredder last operated and inspected on 10/09/2023.

13) Closing Conference

The inspectors conducted the exit meeting with Douglas Greer and Todd Blake. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

Appendix 1 – Photo Log:

14) Signed

KAYLA ACOSTA Digitally signed by KAYLA
ACOSTA
Date: 2023.12.08 11:42:18 -05'00'

Kayla Acosta
Physical Scientist

15) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.12.11 15:48:24 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Appendix 1 – Photo Log

[25] Photos taken on: October 18, 2023

Photos taken by: Kayla Acosta

Photos taken with: Canon PowerShot Elph 180

EPA Property Tag: S/N 902063018726



Photo 1: 5-gallon container of waste laboratory samples.

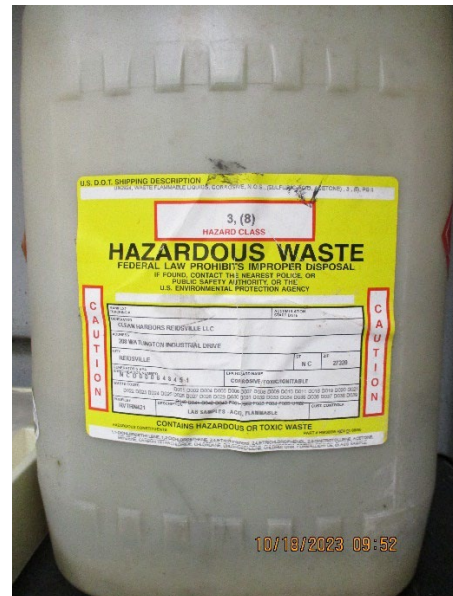


Photo 2: 5-gallon container of waste laboratory samples.



Photo 3: Building 2 Container Storage Areas



Photo 4: Building 2 Container Storage Areas



Photo 5: Building 2 Container Storage Areas



Photo 6: Building 2 Container Storage Areas



Photo 7: Building 2 Container Storage Areas



Photo 8: Building 2 Container Storage Areas



Photo 9: Building 2 Container Storage Areas



Photo 10: Building 2 Container Storage Areas



Photo 11: Building 2 Container Storage Areas



Photo 12: Rail Spur.



Photo 13: South Yard, 10-Day Transfer Facility



Photo 14: South Yard, 10-Day Transfer Facility



Photo 15: South Yard, 10-Day Transfer Facility



Photo 16: South Yard, 10-Day Transfer Facility



Photo 17: Building 3 Storage, De-packing, and Bulking.



Photo 18: Building 3 Storage, De-packing, and Bulking.



Photo 19: Building 3 Storage, De-packing, and Bulking.



Photo 20: Building 3 Storage, De-packing, and Bulking.



Photo 21: Building 7 – Electronic waste.



Photo 22: Building 8 – Hazardous Waste Container Storage Area



Photo 23: Building 8 – Hazardous Waste Container Storage Area



Photo 24: Building 8 – Hazardous Waste Container Storage Area



Photo 25: Building 8 – Hazardous Waste
Container Storage Area