

INSPECTION REPORT

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|--|---|--------------------------|
| Inspection Date: | November 14, 2022 | Inspection Announced: No |
| Time: | Entry: 1:00 PM | Exit: 1:15 PM |
| Media: | Stormwater | |
| Statute (s)/Program(s): | Clean Water Act, NPDES, Industrial Stormwater | |
| Type of inspection: | CEI - Compliance Evaluation Inspection | |
| Access: | Granted | |
| Permittee Name: Republic Services, Inc. | | |
| Facility or Site Name: Republic Services, Inc. | | |
| Facility/Site Physical Address: 3950 Mississippi Avenue | | |
| (City, State, Zip Code) Cahokia Heights, Illinois 62206 | | |
| County/Parish: St. Clair County | | |
| Permit and Application Number: ILR006145 | | |
| SIC or NAICS: 4212 | | |

Inspector Signature and Date: Flatebo, Theodore Digitally signed by Flatebo, Theodore
Date: 2022.12.21 09:25:44 -08'00'

Approver Name and Title: Ryan J. Bahr, Section 2 Supervisor
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: Ryan Bahr Digitally signed by Ryan Bahr
Date: 2022.12.21 15:50:11 -06'00'

| Persons Participating in Inspection: | | | | | |
|---|-------------------|----------------|-------------------------------------|--------------------------------------|--------------------------------------|
| Organization/Title | Name | Phone | Email | Present at Opening Conference | Present at Closing Conference |
| EPA, Environmental Engineer | Ted Flatebo | (312) 886-9402 | flatebo.ted@epa.gov | Yes | Yes |
| EPA, Environmental Scientist | Joan Rogers | (312) 886-2785 | rogers.joan@epa.gov | Yes | Yes |
| EPA, Physical Scientist | Dean Maraldo | (312) 353-2098 | maralod.dean@epa.gov | Yes | Yes |
| Republic Services, Operations Manager | Aaron Campbell | (618) 332-3220 | acampbell2 @republicservices.com | Yes | Yes |

SECTION I – INTRODUCTION

Background Information

Prior to the inspection, EPA inspectors confirmed the following information:

Storm water generated at 3950 Mississippi Avenue, Cahokia Height, Illinois (Facility) is covered by Illinois Environmental Protection Agency (IEPA) general National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges from industrial activities No. ILR006145 (Permit). IEPA records indicate the Permit was issued to Allied Waste Services. The Permit places requirements on the Permittee regarding the storm water generated at the Facility. This general permit has an effective date of April 5, 2017, and the Permit was scheduled to expire on March 31, 2022. The Permit has been administratively extended by IEPA and was still active on the date of inspection.

This inspection served as a follow up to the EPA inspection conducted at the Facility on July 28, 2022. Following that inspection there was two areas of concern that required further clarification. Those areas of concern were:

“TT-RR-003: The oil-seperator was emptied by a contractor on July 19, 2022 and on June 5, 2021. The seperator was full on the date of inspection. The frequency of servicing by the contractor does not appear to be sufficient.”

“TT-RR-014: The Facility has a wastewater aeration system that treats sanitary wastewater and discharges it to a channel southeast of the maintenance building.”

Site Entry and Inspection Objectives

U.S. Environmental Protection Agency Region 5 (EPA) inspectors Ted Flatebo, Joan Rogers, and Dean Maraldo, collectively referred to as the inspection team, arrived the Facility at 1:00 PM on November 14, 2022 for an unannounced inspection.

The inspection team entered the administration area of the Facility and announced the inspection to the two people sitting near the entrance. One of those individuals contacted Mr. Campbell and he joined the inspection team. All three inspectors presented their credentials to Mr. Campbell and explained that the team was seeking to gather additional information to clarify the areas of concern identified above.

SECTION II – INSPECTION

The EPA inspection team spoke to Facility representatives Aaron Campbell, Operations Manager, and Richard Moreno, Maintenance Supervisor, regarding the areas of concern identified above. Mr. Moreno explained that since the July 2022 inspection, the oil-water separator that services the truck washing area has been emptied by a contractor three times. On November 15, 2022, Mr. Campbell provided hauling manifests to Mr. Flatebo via email.

Additionally, the inspection team observed the septic tank that services the administrative/maintenance building. Observations and a records review are detailed below.

SECTION III – OBSERVATIONS

Observations may not be in sequential order.

| Unique Identifying No. | Observation | Area of Concern? |
|------------------------|---|------------------|
| TF-OB-006 | South of the administration/maintenance building is a septic tank. The tank has 3 access ports, see Photo 1. | No |
| TF-OB-007 | Immediately adjacent to the southeast exterior door of the administration/maintenance building is the access point for an oil-water separator. Mr. Moreno stated that the oil-water services the floor drains in the maintenance portion of the building. | No |
| TF-OB-008 | There is an indentation in the ground in the Southeast corner of the property. The indentation appears to be from water drainage, with the water flowing from the Facility east, through the fence line, to Mississippi Avenue. Inspectors observed standing water in the indentation outside the Facility fence line. See Photo 2. | No |
| TF-OB-009 | The inspection team did not observe an aerator or the discharge of sanitary waste at the Facility. The presence of an aerator was discussed in TT-RR-014 from the July 28, 2022 inspection report and the Facility’s Storm Water Pollution Prevention Plan (SWPPP). | No |

SECTION IV – RECORDS REVIEW

Records may not be in sequential order.

| Unique Identifying No. | Record | Area of Concern? |
|------------------------|--|------------------|
| TF-RR-016 | The CleanHarbors waste hauling manifests provided by Mr. Campbell on November 15, 2022 indicate the following: <ul style="list-style-type: none"> - July 19, 2022: 4,600 gallons of oily water removed - August 10, 2022: 700 gallons of oily water removed - September 12, 2022: 3,000 gallons of oily water removed | Yes |

SECTION V – SAMPLING AND ANALYTICAL RESULTS

No samples were collected during this inspection.

SECTION VI - AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

| Unique Identifying No. | Record |
|------------------------|---|
| TF-RR-001 | As discussed in the July 28, 2022 inspection report, all trash trucks are washed at the Facility weekly. Oily water is removed from the Facility on an inconsistent frequency and the volume of oily water removed per occasion is also inconsistent. There is concern that not all process wastewater generated during the truck washing is being captured and disposed of properly. |

SECTION VII – CLOSING CONFERENCE

Closing Conference

The inspection team held a brief closing conference with Mr. Campbell and Mr. Moreno outside the administration/maintenance building. During the closing conference, inspectors discussed the observations and areas of concern identified during the inspection. Observations and areas of concern have not yet been evaluated for a formal compliance determination. The inspection team left the Facility at approximately 1:15 PM.

SECTION VIII – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 1 – Photo Log

**Republic Services, Inc.
EPA Inspection November 14, 2022
All photos taken by Ted Flatebo, Environmental Engineer, U.S. EPA
Camera: Ricoh WG-4**

Note: The time printed on the photos is one hour ahead of the actual time the photo was taken.



1: RIMG0070

Description: Overview of septic tank access points, located in the red circle. The blue circle shows the access point for the oil-water separator that services the floor drains in the maintenance portion of the building

Location: South of the administration building.

Camera Direction: North

Date/Time: November 14, 2022, 1:11 PM



2: RIMG0071

Description: Draining from the Facility. Erosion pattern indicates flow of water from the Facility, through the fence line, east to Mississippi Avenue. Standing water was observed in the indentation outside of the Facility fence line.

Location: Southeast corner of the Facility.

Camera Direction: East

Date/Time: November 14, 2022, 1:12 PM