

RCRA Inspection Report

1. Inspectors and Authors of the Report

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2. Facility Information

Safety-Kleen Systems, Inc. (SKS)
4800 South Old Peachtree Road
Norcross, Georgia 30071
EPA ID # GAD980842777
Permit# HW-078 (S)

3. Responsible Official

Ray Cardenas, Branch General Manager, SKS

4. Inspection Participants

Ray Cardenas	SKS
Carl Williams	SKS
Emilea Dukes	GAEPD
Samantha Luo	GAEPD
Daryl R. Himes	US EPA Region 4

5. Date and Time of Inspection

September 27, 2021 at 9:00 a.m.

6. Applicable Regulations

Sections 3002, 3005 and 3007 of Resource Conservation and Recovery Act (RCRA)

40 Code of Federal Regulations (C.F.R.) Parts 260 through 268, 270, 273 and 279

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, which adopts and incorporates by reference 40 C.F.R. Parts 260-266, 268, and 270, 273 and 279.

Hazardous Waste Permit Number HW-078 (S)

7. Purpose of Inspection

The purpose of this inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of SKS, EPA ID# GAD980842777, with the applicable RCRA regulations and the conditions of Hazardous Waste Permit Number HW-078 (S).

8. Facility Description

SKS is a permitted hazardous waste storage facility that operates under Hazardous Waste Permit Number HW-078 (S). The permit allows for the storage of 18,864 gallons of hazardous waste in containers and 15,000 gallons of hazardous waste in a spent solvent tank.

SKS provides service to dry-cleaners, automotive repair centers, and other miscellaneous businesses by collecting used solvents and used oil from their customers and supplying them with fresh product solvent and oil. The facility consists of the following structures: an office building, container storage warehouse, a solvent "Return and Fill Station" with an associated loading dock, and six above-ground tanks, one of which is for permitted storage of spent solvent.

SKS's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 28, 2020, characterized the facility as a large quantity generator (LQG); Hazardous Waste Transporter; Treatment, Storage and Disposal Facility (TSDF); and a Used Oil Transporter. SKS accepts hazardous wastes bearing the waste codes D001, D004-D011, D018, D019, D021, D022-D043, F002, F003 and F005, and used oil.

9. Findings

The EPA and GAEPD inspectors arrived at the SKS facility at 9:00 a.m. The inspectors were greeted by Mr. Ray Cardenas and Carl Williams of SKS and credentials were presented. A brief opening conference was held with Mr. Cardenas and Mr. Williams in which it was stated that the walk-through inspection of the facility would be performed in the same order as the previous inspection on December 12, 2018.

Mr. Cardenas and Mr. Williams escorted the inspectors on a facility walk-through inspection.

Service Center Building

The Service Center Building includes an area which is permitted for the storage of spent immersion cleaner, dry cleaning waste, spent parts washer solvent, drum washer sediment, tank bottom sediment, and contaminated debris that is picked up from SKS's customers. The permitted capacity for the storage of these items is 2,400 gallons. No hazardous wastes were observed in this area at the time of the inspection.

Four metal cabinets were maintained in this building which were used for the temporary retention of samples collected by the facility for testing purposes. Each sample is labeled with the customer's name and date. After 90 days the samples are managed as hazardous waste and are placed into a 55-gallon container within a satellite accumulation area (SAA). The container was labeled with the words "Hazardous Waste" at the time of the inspection. The container was closed and labeled with a

flammable placard.

The Service Center Building is also used for the storage of various products and supplies.

Return and Fill Processing Area

The Return and Fill Processing Area is used as a loading/unloading area for hazardous waste spent solvent (mineral spirits) and used oil picked up using facility trucks from SKS customers. Drums of spent mineral spirits picked up from off-site generators are unloaded from facility trucks and poured into one of two metal solvent reception vessels which subsequently transfer the spent solvents to the facility's permitted hazardous waste storage tank through a piping system.

Once the drums have been emptied, they are placed on a rack inside of the dumpster. The drum is then mechanically rotated while brushes are used to clean the outside. A nozzle sprays a stream of mineral spirit solvent into the drum to clean its interior. The used solvent goes to a sump in the bottom of the dumpster and the liquid is automatically pumped to the permitted hazardous waste storage tank. There is a basket located in the bottom of the sump that collects sludge and debris that could possibly damage the pump. Sludge and debris that accumulate in the basket are manually removed and placed into a 55-gallon container in a SAA which was observed next to the dumpsters on the loading dock. The container was labeled with the words "Hazardous Waste" and closed at the time of the inspection. The hazardous waste label included hazardous waste codes D001/D006/D008/D018/D039/D040. The container was also labeled with a flammable placard.

The Return and Fill Station has secondary containment in the form of a sloped concrete floor and berms.

The Return and Fill Processing Area is permitted to store 3,270 gallons of hazardous waste in containers. No hazardous wastes were being stored in this area at the time of the inspection.

Mechanic Shop

Formerly the fleet garage, this building now operates as the Mechanic Shop. This area is not permitted to store hazardous waste and does not have secondary containment.

One 330-gallon tote was being used for the accumulation of used oil in this area. The tote was labeled with the words "Used Oil."

Eleven lead acid car-type batteries were observed in this area at the time of the inspection (Photo1). The batteries were not marked with any universal waste labels or markings. In addition, the batteries were not marked with accumulation start dates.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(a)], a Small Quantity Handler of Universal Waste (SQHUW) must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Parked Vehicles

One SKS box truck was parked onsite at the time of the inspection. The truck was opened and inspected. Only product materials were observed on the truck.

Tank Farm

The Tank Farm consists of two 15,000-gallon storage tanks; one horizontal tank, permitted to store hazardous waste spent mineral spirits, and one vertical tank that contains used oil. The two 15,000-gallon tanks, including the high-level alarm systems, eye wash, fire extinguisher, spill control kit and the secondary containment were all inspected. The eyewash was inspected and appeared to be in good working order. The fire extinguisher was up to date and there was a spill control kit near the permitted tank. The secondary containment system was observed to have an area of approximately 10 square feet to which the sealant on the secondary containment system was not in good condition (Photo 2).

Two separate five-gallon buckets were observed inside the secondary containment area of the tank farm. The buckets are used to catch used oil that may spill during the process of dispensing oil into the used oil tank. The buckets were labeled with the words “Used Oil” to identify the contents of the containers.

Accumulation Center

This area is permitted to store 17,480 gallons of hazardous waste in containers.

At the time of the inspection, hazardous waste was observed in two 30-gallon containers in this area. Each of the containers were observed to be closed, labeled with the words “Hazardous Waste” and a flammable placard in addition to being marked with an accumulation start date of less than one year.

Four pallets of universal waste lamps were also observed in this area. The lamps were all observed within closed boxes which were marked with appropriate universal waste language and accumulation start dates of less than one year.

In addition, four five-gallon containers of universal waste batteries were also observed on a pallet in this area. The containers were closed and each was labeled with appropriate universal waste language and accumulation start dates of less than one year.

One closed and labeled 55-gallon container of hazardous waste was observed within an SAA in this building. The container was labeled with the words “Hazardous Waste” and closed at the time of the inspection. The hazardous waste label included hazardous waste codes D001/D006/D008/D018/D039/D040. The container was also labeled with a flammable placard.

Records Review

The inspectors reviewed the facility's hazardous waste manifests (outgoing for December of 2019, March of 2020 and June of 2021 and incoming for 11/5/2019, 2/12/2020 and 7/19/21). No discrepancies were observed.

Training records for Mr. Ray Cardenas, whom has been in his position at the facility for about 18 months were reviewed. Mr. Cardenas completed his RCRA training in January of 2021. No discrepancies were observed.

The facility's contingency plan was found to be up to date including the facility's emergency coordinators.

A review of the facility's inspection records found that the facility failed to have performed daily tank inspections on the facility's hazardous waste storage tank on the following dates in the 2020 calendar year: March 25, September 4 and 25, October 2, 15 and 16, November 5, 6, 24-25 and December 11, 14-27, and 29-31.

Pursuant to Georgia Hazardous Waste Permit Number HW-078(S), Section I.F.2.c. (Section F), "Conditions Related to Compliance with General Facility Standards," states that the facility shall comply with an inspection schedule in Section F of its Permit Renewal Application. Section F call for daily inspections of its hazardous waste tank and container storage areas.

In addition, the facility's inspection records did not document any damage to the coatings for the tanks secondary containment system.

Pursuant to Georgia Hazardous Waste Permit Number HW-078(S), Section III.E.1., "Inspection Schedule and Procedures," states that "the Permittee shall inspect the tank system in accordance with 40 CFR Section 264.195 and inspection schedule including Section F in the Permit Renewal Application received March 5, 2018. Section F-2(b)(2) of the Permit Renewal Application states "The secondary containment system for the tanks must be checked for cracks or other deterioration. Any damage to tanks or secondary containment must be noted and repairs initiated."

Closing Conference

At the conclusion of the walkthrough inspection and record review, a brief closing conference was conducted with each of the facility participants identified above. During the conference, the areas of concern identified during facility walkthrough and also during the record were review identified and discussed.

Facility representatives were informed that reports summarizing findings of the inspection would be forwarded to the facility representative by both the US EPA and GA EPD.

10. Signed

DARYL HIMES Digitally signed by DARYL HIMES
Date: 2021.10.27 22:19:31 -04'00'

Daryl R. Himes
Environmental Engineer

Date

11. Concurrence

**ARACELI
CHAVEZ** Digitally signed by ARACELI
CHAVEZ
Date: 2021.11.08 10:57:58
-05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

SAFETY KLEEN

NORCROSS, GEORGIA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

SEPTEMBER 27, 2021

Photos taken by Daryl Himes

Photos taken with Canon Power Shot Elph 360 HS



Photo 1 – Lead acid universal waste batteries in the Mechanic Shop



Photo 2 – Floor of secondary containment system for facility’s permitted hazardous waste storage tank.