

INSPECTION REPORT

Inspection Date:	July 28, 2022	Inspection Announced: No
Time:	Entry: 8:30 AM	Exit: 10:00 AM
Media:	Stormwater	
Statute (s)/Program(s):	Clean Water Act, NPDES, Industrial Stormwater, Indirect Discharger	
Type of inspection:	CEI - Compliance Evaluation Inspection	
Access:	Granted	
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Permittee Name:	Republic Services	
Facility or Site Name:	Republic Services	
Facility/Site Physical Address:	3950 Mississippi Avenue	
(City, State, Zip Code)	Cahokia Heights, Illinois 62206	
County/Parish:	St. Clair County	
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Permit and Application Number:	ILR006145	
SIC or NAICS:	4212	

Inspector Signature and Date: Flatebo, Theodore Digitally signed by Flatebo, Theodore
Date: 2022.08.18 14:51:07 -05'00'

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

Approver Signature and Date: Bahr, Ryan Digitally signed by Bahr, Ryan
Date: 2022.08.18 15:42:57 -05'00'

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 Engineer	Ray Cullen	(312) 996-0538	cullen.raymond@epa.gov	Yes	Yes
Illinois EPA, Inspector	Wayne Caughman	(618) 346-5120	wayne.caughman@illinois.gov	Yes	Yes
Republic Services, Operations Supervisor	Billy Prentice	(314) 744-8156	bprentice@republicservices.com	Yes	Yes
Republic Services, Operations Manager	Aaron Campbell	(618) 332-3220	acampbell2@republicservices.com	No	Yes

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SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

U.S. Environmental Protection Agency Region 5 (EPA) inspectors Ted Flatebo and Ray Cullen, and Illinois Environmental Protection Agency (IEPA) inspector Wayne Caughman arrived at Republic Services (the “Site” or “Facility”), located at 3950 Mississippi Avenue, Cahokia Heights, Illinois at 8:30 AM on July 28, 2022 for an unannounced inspection. The two EPA inspectors and one IEPA inspector, will be collectively referred to as the inspection team.

The inspection team presented their credentials to Mr. Prentice and informed him that this was an EPA inspection to determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) program. The inspection was conducted under the authority of the NPDES

program and Section 308 of the CWA. The table above identifies the attendees who participated in the inspection.

This report is based on information supplied by Facility representatives, observations made by the EPA inspectors, and records and reports maintained by the permittee, IEPA, and EPA. These include the following: direct observations made by the EPA inspectors, photographs taken by EPA inspectors, and verbal or written statements made or supplied by Facility representatives (the permittee) during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA inspectors by Facility representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of EPA, IEPA, and public records may be included in this report. During the opening conference, Mr. Prentice was asked if he considered any information to be confidential business information (CBI). Mr. Prentice stated that no information was considered CBI by the Facility.

Background Information

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

Storm water generated at 3950 Mississippi Avenue, Cahokia Height, Illinois is covered by IEPA general 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 had 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.

SECTION II – INSPECTION

Opening Conference

After the inspection team presented their credentials to Mr. Prentice, the team began the inspection opening conference at 8:30 AM. Mr. Prentice provided the following information: the Facility operates 24 hours per day, 7 days a week. The Facility operates two primary shifts, with a single employee working the overnight shift. The Facility serves as a trash truck depot for preventative maintenance, washing, fueling, and parking. The depot supports approximately 35-40 trucks, and the Facility has approximately 35 employees. Some empty roll off dumpsters are stored on site. Trucks and dumpsters are empty when they are at the Facility, refuse is disposed of at various landfills depending on the type of refuse collected.

The Facility does have a Storm Water Pollution Prevention Plan (SWPPP) which was provided to the inspection team upon request. The SWPPP on site was dated June 2015 and revised in October 2017. Following the inspection, the Facility provided an updated SWPPP dated April 2022.

Facility Walk Through

After concluding the opening conference, EPA inspectors Mr. Flatebo and Mr. Cullen began the Facility walk through with Mr. Prentice. Mr. Caughman remained in the office and reviewed the SWPPP.

The inspectors began in the truck washing area north of the fueling station. This area is not covered by a structure. The area has an oil-water separator where wash water drains to. Mr. Prentice stated that the oil-water separator is not connected to the sewer and is drained by a contractor when it is full. The April 2022 SWPPP states that the oil-water separator is comprised of two tanks with capacities of 500 and 2,500 gallons. According to Richard Moreno, maintenance supervisor, trucks are washed weekly on Saturdays using a pressure washer stored in the building between the truck washing area and the fueling area. Truck washing is performed by a contractor.

The Facility provided its two most recent hauling manifests for the oil-water separator:

July 19, 2022: 4,600 gallons of oily water

June 4, 2021: 4,000 gallons of oily water

Outside of truck washing, all maintenance activities are carried out in the maintenance building. Engine fluids are drained using a pit and fluid collection system. The system directs used fluids to their corresponding containers. There are multiple floor drains within the maintenance building, which according to Mr. Moreno drain to the oil-water separator. Mr. Moreno also stated that the floor scrubber used within the maintenance building disposes of its dirty water via the oil-water separator. Within the maintenance building, there is a single room that stores all of the new and used engine fluids, the room itself acts as secondary containment and contains no floor drains. The April 2022 SWPPP identified the following fluid storage capacities:

Used Motor Oil:	1000 gallons
Diesel Engine Oil:	560 gallons
Hydraulic Fluid:	560 gallons
Antifreeze:	275 gallons
Used Antifreeze:	275 gallons
Gear Oil:	275 gallons
Transmission Fluid:	175 gallons
Windshield Washer Fluid:	300 gallons

EPA inspectors observed a Facility employee dispose of dirty mop water on the ground in the parking lot. Inspectors discussed with Facility staff the best management practices for disposing of oily mop water.

EPA inspectors then moved to the fueling area. The Facility has a 10,000 gallon underground diesel fuel storage tank. There is a single fuel pump station with two hoses attached. The fueling area is not covered by a structure. A spill kit is located in the building between the fueling area and the truck washing area. Mr. Prentice stated that each truck is equipped with a spill kit for use in the field as necessary.

EPA inspectors then moved to the outdoor storage area for trucks and dumpsters. Inspectors observed both roll off dumpsters and front load dumpsters stored at the Facility. Mr. Prentice stated that the front load dumpsters of various sizes are not normally stored at this Facility and were being stored there on a temporary basis. When

asked how stormwater is disposed of when it collects in open dumpsters, Mr. Prentice stated that the water is emptied onto the ground. In the truck parking area, stained soil was observed.

Both the 2015 and 2022 SWPPPs state that there is a wastewater aeration system located at the Facility that treats wastewater and discharges it to a channel located southeast of the maintenance building. Following the inspection, EPA spoke to Joshua Allen, an environmental manager for Republic Services. Mr. Allen clarified that the aeration system treats sanitary wastewater generated at the Facility and discharges it to the channel southeast of the maintenance building. Mr. Allen confirmed that all process wastewater flows to the oil-water separator where it is stored until it is hauled away by a contractor.

SECTION III – OBSERVATIONS

Observations may not be in sequential order.

Unique Identifying No.	Observation	Area of Concern?
TF-OB-001	Fueling area does not have a structure to prevent stormwater contamination.	Yes
TF-OB-002	The new/used fluid storage tanks in the maintenance building are not clearly labeled.	Yes
TF-OB-003	There was stained soil in the truck parking area.	Yes
TF-OB-004	A Facility employee disposed of oily mop water on the ground outside.	Yes
TF-OB-005	The oil-water separator was full.	Yes

SECTION IV – RECORDS REVIEW

Records may not be in sequential order.

Unique Identifying No.	Record	Area of Concern?
TF-RR-001	Documentation required to be kept with the SWPPP was not available for review during the inspection. Documentation provided by the Facility after the inspection included: -Employee training records; and -April 2022 SWPPP.	Yes
TF-RR-002	There is insufficient documentation to verify if the 2020 annual SWPPP inspection was conducted.	Yes
TF-RR-003	The oil-seperator was emptied by a contractor on July 19, 2022 and on June 5, 2021, but the seperator was full on the date of inspection. The frequency of servicing by the contractor does not appear to be sufficient.	Yes
TF-RR-004	The Facility did not submit a Notice of Intent (NOI) to IEPA for coverage under the 2017-2022 storm water general permit for industrial activities.	Yes
TF-RR-005	The Facility provided insufficient documentation to verify if quarterly visual observations were made at each outfall.	Yes
TF-RR-006	The Facility provided insufficient documentation to verify if any of the quarterly SWPPP inspections were not conducted within 72 hours of a 0.25 inch rain fall event.	Yes
TF-RR-007	The quarterly SWPPP inspections provide comments such as “Yes,” “No,” and “Ok” in the comment section. It is not clear which question each response is related to.	Yes
TF-RR-008	The quarterly SWPPP inspections provide an employee signature. Some of these signatures are not legible and no printed employee name is provided.	Yes
TF-RR-009	The Facility provided insufficient documentation to verify if the annual inspection reports and SWPPP were submitted electronically to IEPA every year.	Yes
TF-RR-010	IEPA records identify the Facility as owned and operated by Allied Waste Services. At the time of inspection, the Facility was operating under the name Republic Services. If there was a change in ownership, the Facility should have filed a Notice of Termination (NOT) with IEPA within 30 days.	Yes
TF-RR-011	Inspectors observed soil staining in the truck parking area. There was no documentation in the SWPPP regarding a corrective action to clean up stained soil and to prevent future contamination.	Yes
TF-RR-012	The April 2022 SWPPP states that all trash containers stored outdoors should be covered. Inspectors observed containers that were not covered.	Yes
TF-RR-013	The April 2022 SWPPP does not contain information regarding the frequency, volume, or destination of truck wash water disposal.	Yes
TF-RR-014	The Facility has a wastewater aeration system that treats sanitary wastewater and discharges it to a channel southeast of the maintenance building.	Yes

TF-RR-015	The Facility’s SIC code 4212 is listed as an SIC requiring coverage in Subpart P – Land Transportation and Warehousing of Appendix 1 of the Stormwater General Permit applicable to this Facility.	No
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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-OB-001	Fueling area does not have a structure to prevent contamination of stormwater. Permit ILR006145, Section F.e.ii
TF-OB-002	The new/used fluid storage tanks in the maintenance building are not clearly labeled. Permit ILR006145, Appendix 1, Section P.3.1.3
TF-OB-003	There was soil contamination in the truck parking area. Permit ILR006145, Section H.1.a
TF-OB-004	A Facility employee disposed of oily mop water on the ground outside. Permit ILR006145, Section H.1.a
TF-OB-005	The oil-water seperator was full. Permit ILR006145, Section F.2.viii
TF-RR-001	Documentation required to be kept with the SWPPP was not available for review during the inspection. Documentation provided by the Facility after the inspection included: -Quarterly SWPPP inspections for the first two quarters of 2022; -Employee training records; and -Updated SWPPP (April 2022). Permit ILR006145, Section E
TF-RR-002	There is insufficient documentation to verify if the 2020 annual SWPPP inspection was conducted. Permit ILR006145, Section G
TF-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. Permit ILR006145, Section F.2.viii

TF-RR-004	<p>The Facility did not submit a Notice of Intent (NOI) to IEPA for coverage under the 2017-2022 storm water general permit.</p> <p>Permit ILR006145, Section D.1.a.i</p>
TF-RR-005	<p>The Facility provided insufficient documentation to verify if quarterly visual observations were made at each outfall.</p> <p>Permit ILR006145, Section J</p>
TF-RR-006	<p>The Facility provided insufficient documentation to verify if any of the quarterly SWPPP inspections were not conducted within 72 hours of a 0.25 inch rain fall event.</p> <p>Permit ILR006145, Section G.1</p>
TF-RR-007	<p>The quarterly SWPPP inspections provide comments such as “Yes,” “No,” and “Ok” in the comment section. It is not clear which questions these responses are related to.</p> <p>Permit ILR006145, Section G</p>
TF-RR-008	<p>The quarterly SWPPP inspections provide an employee signature. Some of these signatures are not legible and no printed employee name is provided.</p> <p>Permit ILR006145, Section G.2.b</p>
TF-RR-009	<p>The Facility provided insufficient documentation to verify if the annual inspection reports and SWPPP were submitted electronically to IEPA every year.</p> <p>Permit ILR006145, Section K.1</p>
TF-RR-010	<p>IEPA records identify the Facility as owned and operated by Allied Waste Services. At the time of inspection, the Facility was operating under the name Republic Services. If there was a change in ownership, the Facility should have filed a Notice of Termination (NOT) with IEPA within 30 days.</p> <p>Permit ILR006145, Section L.4.a</p>
TF-RR-011	<p>Inspectors observed soil staining in the truck parking area. There was no documentation in the SWPPP regarding a corrective action to clean up stained soil and to prevent future contamination.</p> <p>Permit ILR006145, Section H.1.a</p>
TF-RR-012	<p>The April 2022 SWPPP states that all trash containers stored outdoors shall be covered. Inspectors observed containers that were not covered.</p> <p>Permit ILR006145, Section E.9.a</p>
TF-RR-014	<p>The Facility has a wastewater aeration system that treats sanitary wastewater and discharges it to a channel southeast of the maintenance building.</p> <p>40 C.F.R. 402</p>

SECTION VII – CLOSING CONFERENCE

Closing Conference

The inspection team held a closing conference with Facility personnel beginning at approximately 9:45 AM. 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 10:00 AM.

SECTION VIII – LIST OF APPENDICES

Appendix 1 – Photo Log

**Republic Services
EPA Inspection July 28, 2022
All photos taken by Ted Flatebo, Environmental Engineer, U.S. EPA
Camera: Ricoh WG-4**



1: RIMG0070

Description: Truck washing area. Oil-water separator located underground, covered by gray covers in center of photo.

Location: North of diesel pumping area.

Camera Direction: East

Date/Time: July 28, 2022, 8:58 AM



2: RIMG0071

Description: Pressure washer used for truck washing.

Location: Inside building between truck washing area and diesel pumping area.

Camera Direction: North

Date/Time: July 28, 2022, 8:59 AM



3: RIMG0072

Description: Floor drain in maintenance building. Drains to oil-water separator.

Location: Maintenance building.

Camera Direction: West

Date/Time: July 28, 2022, 9:06 AM



4: RIMG0073

Description: Engine fluid collection system and maintenance pit.

Location: Maintenance building.

Camera Direction: North

Date/Time: July 28, 2022, 9:10 AM



5: RIMG0074

Description: Facility employee disposed of mop water outside.

Location: Maintenance building.

Camera Direction: South

Date/Time: July 28, 2022, 9:15 AM



6: RIMG0075

Description: Overview of fluids storage area.

Location: Maintenance building.

Camera Direction: Northwest

Date/Time: July 28, 2022, 9:18 AM



7: RIMG0076

Description: Overview of fluids storage area.

Location: Maintenance building.

Camera Direction: Southwest

Date/Time: July 28, 2022, 9:18 AM



8: RIMG0077

Description: Overview of diesel pumping area.

Location: North of maintenace buidling.

Camera Direction: North

Date/Time: July 28, 2022, 9:22 AM



9: RIMG0078

Description: Roll off storage area. Note some containers are not covered.

Location: Northwest corner of property.

Camera Direction: Northwest

Date/Time: July 28, 2022, 9:26 AM



10: RIMG0079

Description: Dumpster storage area. Note some containers are not covered.

Location: West end of property.

Camera Direction: West

Date/Time: July 28, 2022, 9:27 AM



11: RIMG0080

Description: Soil staining.

Location: Truck parking area.

Camera Direction: North

Date/Time: July 28, 2022, 9:29 AM