



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 22 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Derick Leonard
General Manager
Safety Kleen Systems
125 Sommerville Park Road
Raleigh, North Carolina 27603

SUBJ: RCRA Compliance Evaluation Inspection
Safety Kleen - Raleigh (EPA ID# NCD000776740)

Dear Mr. Leonard:

On August 14, 2018 the U.S. Environmental Protection Agency, along with the North Carolina Department of Environmental Quality (NC DEQ), conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection at Safety Kleen Systems' facility, located at 125 Sommerville Park Road, Raleigh, North Carolina, in order to determine its compliance status with RCRA.

Enclosed is the EPA RCRA inspection report that indicates deficiencies of RCRA were discovered. A copy of this report has been forwarded to NC DEQ for follow-up.

If you have any questions regarding this matter, please contact Laurie Benton DiGaetano, of my staff, by phone at (404) 562-8948 or by email at benton-digaetano.laurie@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Alan A. Annicella".

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

cc: Mr. Mark Burnette, NC DEQ

RCRA Inspection Report

1) Inspector and Author of Report

Laurie Benton DiGaetano, Environmental Engineer
Hazardous Waste Enforcement and Compliance Section
Resource Conservation and Restoration Division
U.S. Environmental Protection Agency (EPA), Region 4
61 Forsyth Street, S.W. Phone: 404-562-8948
Atlanta, Georgia 30303 Email: benton-digaetano.laurie@epa.gov

2) Facility Information

Safety Kleen – Raleigh EPA ID# NCD000776740
125 Sommerville Park Road
Raleigh, NC 27603

3) Responsible Officials

Derick Leonard, General Manager

4) Inspection Participants

Derick Leonard, Safety Kleen Mark Burnette, NC DEQ
Chris Holman, Safety Kleen Laurie Benton DiGaetano, US EPA
Brad Bailey, NC DEQ

5) Date of Inspection

August 14, 2018

6) Applicable Regulations

Resource Conservation and Recovery Act (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 13¹, and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Safety-Kleen Systems, Incorporated's compliance with the applicable requirements

¹ North Carolina's newly adopted Generator Improvements Rule (GIR) regulations are currently under review by the EPA and have not yet been authorized. However, for ease of reference and for consistency with the State Inspection Report, this CEI Report will cite to the North Carolina and federal hazardous waste regulations as amended by the GIR. These provisions are effective and enforceable as a matter of State law, but are not federally enforceable. Until the State is authorized for the GIR, the EPA will enforce the provisions of the federal generator regulations in effect prior to the adoption of the GIR.

of RCRA, the corresponding NC DEQ regulations, and the North Carolina Hazardous Waste Facility Operating Permit NCD000776740 (the "Permit"). This was an EPA lead inspection.

8) **Facility Description**

Safety-Kleen Systems, Incorporated (SK) is an international service-oriented company offering solvent and reclamation services, oil recycling and re-refining services, and industrial waste management and environmental solutions for customers. Some of these services have been specifically denoted by SK as "closed loop" services, in which SK representatives retrieve spent solvent fluid from customers' facilities and replace it with clean solvent. The dirty, or spent fluid is brought to a SK Service Center where it is prepared for bulk reclamation at one of SK's Recycle Centers. Reclaimed (clean) solvent is then delivered back to the Service Center for subsequent distribution to customers. Waste streams generated through SK's "closed loop" services include parts washer fluid, immersion cleaner, and paint gun cleaner. According to SK, the solvents in each of these "closed-loop" services have historically been of a consistent nature, and data for the material is constantly renewed and updated as material is received and processed.

Under SK's "closed-loop" Parts Washer Service Program, SK either provides customers with a parts washer unit and a solvent exchange service, or offers parts washing solvent and solvent reclamation services for customers who own their own parts cleaning machines, regardless of the machine model. The primary solvent used in SK's "closed-loop" Parts Washer Service Program is petroleum naphtha, which is commonly referred to as "mineral spirits". Customers using this service include: automobile dealers; auto repair shops; garages; fleet maintenance shops; manufacturers of automobiles, trucks, airplanes, and heavy and light manufacturing equipment; machine shops; machine manufacturing and fabrication facilities; and other businesses. Generic prequalification information for spent parts washer solvent is regularly renewed or updated using analytical data from materials that are received and processed in the program. However, the spent solvent typically exhibits either the characteristic of ignitability and/or several toxicity characteristics. SK has identified spent parts washer solvents as D001 / D004 - D011 / D018 / D019 / D021 - D030 / D032 - D043 hazardous waste.

When servicing parts washers at the customer's facility, SK representatives conduct visual inspections of the volume and color of spent solvents in each unit before collecting the material. The parts washer machines are used for a specific purpose, to clean and degrease parts, at specific locations, and SK representatives service these machines on a scheduled basis. The contaminants (e.g. oil, grease, carbon deposits) in SK's parts washer solvent appear to be of a consistent nature, and visual inspections are used to evaluate whether or not the material may have been otherwise contaminated. An increased volume of spent solvents in the designated container indicates that additional material may have been added to the unit. In addition, parts washer solvent changes color as it is used, and the specific color change is dependent on the type of equipment being cleaned. If the observed volume or color of the spent solvent does not appear to be consistent with the expected conditions, the SK service representative should sample the waste for possible contamination or reject the waste.

Under the Immersion Cleaner Service Program, SK provides a "closed-loop" program for SK customers using the company's single-phased heavy aromatic naphtha-based formulation

immersion cleaner. Used immersion cleaner becomes spent after removing varnish and gum from such things as carburetors, transmissions, and other metal parts. Although oil, grease, and other solids may be entrained in the solvent during operations, the used material is otherwise basically unchanged from its product state. SK manages spent immersion cleaner as D004 - D011 / D018 / D019 / D021 - D030 / D032 - D043 hazardous waste.

SK also provides a “closed-loop” Paint Gun Solvent Program. This paint waste / used lacquer thinner reclamation program primarily services automobile body repair shops. Customers in this program generate hazardous waste paint related materials and spent lacquer thinner through various painting operations, and collect the waste in containers at their facility. The primary constituents of these wastes are non-halogenated solvents (toluene, xylene, methyl ethyl ketone), and SK manages the material as D001 / F003 / F005 / D004 - D011 / D018 / D019 / D021 - D030 / D032 - D043 hazardous waste.

Under the Dry Cleaner Service Program, SK collects dry cleaner still bottoms, filter cartridges, and filter media from filters used to purify the dry-cleaning solvent during usage, and sells recycled perchloroethylene and new filters to dry cleaner customers. The Dry Cleaner Service Program includes the recovery of high purity perchloroethylene (tetrachloroethylene) from these wastes. Waste generated from dry cleaning operations contains various concentrations of tetrachloroethylene, mineral spirits (petroleum naphtha), and trichloro-trifluoroethane and other used products. SK manages dry cleaning wastes as F002 / D001 / D004 - D011 / D018 / D019 / D021 - D030 / D032 - D043 hazardous waste.

SK manages used oils under the Safety-Kleen Oil Services (SKOS) used oil management program. Used oil accepted into this program will eventually be re-refined into lubricating oils, or processed into an on-specification or off-specification used oil fuel. SK has developed pre-qualification, collection and analysis procedures to ensure that material handled in the used oil management program is defined as used oil; to ensure that the waste oils received can be re-refined into lubricants, processed into fuels, or treated as oily waters; and to protect against receipt of hazardous waste and Polychlorinated Biphenyls (PCBs). SKOS does not require laboratory analysis for used oils from automotive generators, because those material appear to be well defined and industry specific. Used oils generated by other industrial customers, however, must be sampled and analyzed prior to the initial pickup. Industrial used oil samples are analyzed for total metals (arsenic, cadmium, chromium, lead); F-listed halogenated solvents; flash point; and PCB content. If analysis indicates that the material contains a listed hazardous waste, the industrial account may not be included in the SKOS program.

SK owns and operates the 3.8-acre subject facility as a SK Service Center, conducting activities related to the leasing and servicing of parts cleaning equipment, the collection and distribution of solvents, the collection of paint wastes, the collection and management of industrial wastes. This facility is located in an area of Raleigh that is zoned for industrial development, and it has been in operation since July 1977. The company has been operating as a large quantity generator (LQG) and a permitted treatment, storage and disposal (TSD) facility at this location for over 25 years, and currently operates as an LQG, TSD and 10-day transfer facility under the NAICS Code 562112 for Hazardous Waste Collection. On November 8, 2013, NC DEQ issued the most recent Hazardous Waste Management Permit No. NCD 000 776 740 R2 (“the Permit”) to Safety Kleen

Systems, Inc. ("SK – Raleigh"). The Part B Permit Application was subsequently modified to add one non-RCRA storage tank on 05/15/2014, and to change the list of emergency contact personnel on 05/13/2015. The Permit specifies the conditions for storing hazardous waste in two non-ignitable waste container storage areas, one flammable waste storage shed, two drum washer / dumpster units, and one hazardous waste storage tank. The tank farm at SK – Raleigh also includes three storage tanks for managing used oil and one storage tank for managing parts washer solvent product. The volume of waste that can be stored at SK – Raleigh is limited by the capacity of the storage tank and the capacity of the permitted storage areas.

Although solvents are distributed from and returned to the SK – Raleigh Service Center, no reclamation services are performed at this facility. Some containers of used parts washer solvent, and all containers of spent immersion cleaner, waste paint related material, spent lacquer thinner, and dry-cleaning wastes remain closed and are not emptied at this location. Instead, they are either managed as 10-day transfer waste containers or they are accepted under the Permit as drum-in-drum-out (DIDO) storage containers. Transfer waste may be held in various areas onsite including a designated covered 10-day transfer waste management area, the permitted container storage areas, two non-permitted flammable storage sheds, the tank farm, and the truck station. DIDO containers may be stored in one of three permitted hazardous waste container storage areas at SK – Raleigh: the East Drum Storage Room, the West Drum Storage Room, and the Flammable Waste Storage Shed.

Typically, drums of used parts washer solvent are collected from customers and delivered to the off-loading dock at SK – Raleigh's Return and Fill Station. Employees open these drums manually and pour the used solvent into one of two tank-like Subpart X drum washer / dumpster units. Each of these 375-gallon capacity units is a vertical, above-ground dumpster-like unit, located on a steel grate above a reinforced concrete containment area. The units are specifically designed to remove residuals from both the inside and outside of various open-ended containers, and transfer this material to the permitted hazardous waste storage tank (Tank No. 3). They are not designed or intended to treat or store an accumulation of hazardous waste, and they operate at ambient pressure and temperature. Two rotary brushes rotate the open-ended drum inside each drum washer / dumpster unit, and a recirculating pump cleans the container by lifting solvent from a collection reservoir and injecting it inside the turning drum. Next, a separate drum rinsing unit (i.e., drum spritzer) is used to provide a final rinse of SK's premium solvent to drums that will be subsequently reused by filling with clean recycled or virgin parts cleaning solvent product. Rinsate from the drum spritzer unit is managed as Facility generated waste, which is gravity-drained via a flexible hose connected directly to one of the drum washer / dumpster units and subsequently pumped to Tank No. 3. The contents of Tank No. 3 are periodically transferred via tanker truck to a SK Recycling Center.

According to the Permit, SK – Raleigh is subject to certain air emission standards for tanks, containers, and miscellaneous units found in 40 C.F.R. Part 264 Subparts BB and CC. First, SK – Raleigh has determined that Tank No. 3, the drum washer / dumpster units, and ancillary equipment contain or contact hazardous wastes with organic concentrations of at least 10 percent by weight. Specifically, the facility operates pumps in heavy liquid service, open-ended valves or lines that have one end of the valve seat in contact with process fluid and one end with the atmosphere, valves in heavy liquid service, flanges and other connectors, and pressure relief

devices subject to 40 C.F.R. Part 264 Subpart BB. Second, SK – Raleigh has determined that the facility manages wastes that range in Volatile Organic concentrations up to 100%. Therefore, all wastes managed in containers and in the storage tank are handled as being subject to 40 C.F.R. Part 264 Subpart CC.

9) **Previous Inspection History**

NC DEQ has conducted at least one RCRA CEIs at the subject facility every year since 1990. No violations have been reported during those inspections since 1996.

EPA most recently conducted a RCRA CEI at the subject facility in 2005.

10) **Findings**

On August 14, 2018, EPA inspector Laurie Benton DiGaetano, accompanied by NC DEQ inspector Brad Bailey, and the Resident Inspector Supervisor Mark Burnette, arrived at SK – Raleigh at approximately 8:45 a.m. Mr. Derick Leonard, General Manager, immediately received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. Mr. Leonard led the inspectors on a tour of the Facility operation.

Security: Visitors to SK – Raleigh are required to register at the main entrance upon their arrival at the facility. The entire facility appears to be surrounded by a 6-foot-high chain-link metal fence, topped with three strands of barbed wire. Entry to the facility is controlled by keeping all gates closed and/or locked, except to allow ingress or egress of service vehicles, or by having facility personnel visually monitor open gates. According to the Permit, security surveillance is also provided throughout the active portion of the facility by way of infrared outdoor motion detection devices and accessible door contacts on the warehouse building. The security system is monitored by facility personnel during normal operating hours and by an independent commercial central monitoring station during non-operating hours.

Additional safety provisions at SK – Raleigh include emergency alarms in various areas of the facility; a telephone system used for on-site and off-site communication; and an intercom system. Fire extinguishers are located in each container storage area, in the tank storage area and on the loading dock. Signs bearing the legends “Danger, Unauthorized Personnel Keep Out” and “No smoking” are required at all fence gates and along the outside of the perimeter fence. The signs must be legible from a distance of 25 feet, visible from all angles, and posted with distances of 50 feet or less between each sign.

According to the Permit, SK evaluates the homogeneity of the core waste streams through its company-wide Annual Recharacterization Process, which is a statistical analysis of each of these waste streams. Many hazardous waste containers managed at SK – Raleigh must be controlled in accordance with Level 1 container standards. SK drums are designed to meet DOT standards, and Level 1 containers that are not emptied upon receipt at the facility must be inspected upon arrival and each day thereafter until the container is transferred to a recycle center. Each Level 1 container and its cover and closure devices are inspected for visible cracks, holes, gaps, or other open spaces, and containers are not permitted to remain at the facility over one year.

Main Warehouse: The inspection tour began at SK – Raleigh’s Warehouse Building, a prefabricated metal building containing office space, a warehouse for storing containerized product and waste materials, a loading dock, and a Return and Fill Station. SK – Raleigh produces aqueous parts washer solution in the main warehouse area. A concentrated form of the solution arrives at the facility in 5-gallon or 55-gallon containers. It is then diluted to the desired concentration and packaged in 30-gallon drums for shipment to SK customers. After use at the customer facility, used aqueous parts washer solvent is returned to SK – Raleigh in 30-gallon drums. According to Mr. Leonard, only one SK – Raleigh customer generates a hazardous waste used aqueous parts washer solvent. This material has been identified as D002 hazardous waste, and it is managed at SK – Raleigh as 10-day transfer waste. SK has determined that used aqueous parts washer solvent that is returned from all other customers does not exhibit any hazardous waste characteristics. The material is accepted at SK – Raleigh where it is transferred into one of the on-site Frac Tanks and managed as oily water. SK performs a waste recharacterization of this material on an annual basis.

The inspection participants entered a small room located within the main warehouse area, where the inspectors observed several boxes of universal waste lamps. The inspectors observed three boxes of 4-foot used fluorescent lamps. One box was closed and dated 01/01/2017. Mr. Leonard consolidated the remaining two boxes into a single box, which was open and dated 04/01/2017. The inspectors also observed two open boxes of used metal halide lamps, which were not marked with an accumulation start date. Mr. Leonard stated that these used lamps were generated on-site.

Pursuant to 15A NCAC 13A .0119 [40 C.F.R. § 273.13(d)(1)], a “Small Quantity Handler of Universal Waste” (SQHUW) must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Pursuant to 15A NCAC 13A .0119 [40 C.F.R. § 273.15(a)], a SQHUW may accumulate universal waste for no longer than one year from the date the universal waste is generated.

The inspectors observed 13 boxes of 4-ft used fluorescent bulbs on a single pallet within the main warehouse area. These universal hazardous waste bulbs were generated by SK – Raleigh customers and brought to this location. The boxes were closed, labeled and dated.

Inspectors also observed five 15-gallon containers of hazardous waste used immersion cleaner in the main warehouse area. Mr. Leonard explained that these containers had been staged in this area to prepare them for shipment off-site. The containers were labeled D027 / D039 / D040 hazardous waste corrosive liquid, basic, organic (monoethanolamine). Two were dated 08/07/2018, one was dated 08/08/2018, one was dated 08/09/2018, and the oldest container was dated 07/08/2018.

East and West Drum Storage Rooms: The Service Center’s container storage area is comprised of two permitted hazardous waste storage units: the East Drum Storage Room and the West

Drum Storage Room. The East Drum Storage Room is permitted to store up to 2,760 gallons of immersion cleaner wastes, aqueous parts washer solvent and perchloroethylene waste. The West Drum Storage Room is permitted to store up to 8,064 gallons of immersion cleaner wastes, aqueous parts washer solvent and perchloroethylene waste. Both rooms may also be used to store photographic waste as 10-day transfer waste.

Inside the East and West Drum Storage Rooms, the Permit requires SK - Raleigh to place containers of hazardous waste onto pallets to prevent contact with liquids resulting from leaks or spills. Unless otherwise noted, containers are single stacked onto pallets, and these pallets may only be stacked two high. Dry cleaning waste containers of 30-gallons or less may be stacked two high per pallet, and 5-gallon pails may be stacked up to four high on a single pallet. However, the Permit requires any containers stacked two or more to a single pallet to be secured to the pallet by stretch wrapping or strapping. Aisle space of at least two feet is required on a minimum of two sides of each single row of pallets containing hazardous waste. Container labels must contain, at a minimum, information necessary to identify the waste (i.e. EPA waste codes), along with the generator's name, address, USEPAID number and manifest tracking number (if applicable), and the date when the waste was received at the Facility.

Containers of spent immersion cleaner solvent, dry cleaning wastes, and paint wastes remain in permitted storage areas until they are shipped off-site. However, the Permit allows SK - Raleigh to temporarily stage these containers during a single 8-hour working shift in order to arrange and palletize like materials in preparation for shipment off-site. Temporary staging occurs in areas such as the service center warehouse and outdoor concrete surfaces within and adjacent to the less than 10-day transfer waste storage shelter. Unless it is done in response to a leak or similar problem, these containers may not be opened, and their contents may not be transferred from one container to another while they are at the SK – Raleigh facility.

The inspectors entered the West Storage Area, and observed the concrete floor, spill kit, and emergency alarm button. A sign identifying this area was posted next to the door within the warehouse area, and with the exception of the threshold area, the floor was surrounded with a concrete curb. A metal grate along the threshold covered a sump area to collect liquids that would not be contained by the perimeter curb.

Inside the West Storage Area, signs on the walls indicated designated areas for wastes heading to Smithfield, Deer Park, Chattanooga, Lexington, Reidsville, Spring Grove, or El Dorado. The inspectors observed two wooden pallets holding 16-gallon drums in this area. Eleven of these drums contained clean immersion cleaner product to be sent to SK customers. One drum was an empty container connected to a broken immersion unit. The inspectors also observed another pallet with two 5-gallon "suitcase" containers holding used aqueous brake cleaner, which is managed as a non-regulated waste.

SK – Raleigh currently utilizes the East Storage Area for general storage, and no hazardous waste was observed inside this area at the time of the inspection.

Return and Fill Station: SK – Raleigh's Return and Fill Station is an area covered by a roof, enclosed on two sides, and equipped with secondary containment. The secondary containment at

the Return and Fill Station consists of concrete flooring and curbing with the floor sloped to a central collection sump. According to the Permit, the interior surface of the secondary containment structure has been sealed with an epoxy and/or urethane coating to prevent spilled or leaked materials from migrating out of the containment area. The loading and unloading area of the Return and Fill Station is used to manage incoming containers of used materials and outgoing containers of clean product material. Incoming containers of solvent-based parts washer fluid are typically emptied into the drum washer / dumpster unit, while incoming containers of aqueous based parts washer fluid are typically emptied into a vacuum truck, which is used to transfer this material to the on-site Frac Tanks.

The Permit allows for drums of used parts washer solvent to be staged inside the secondary containment area of the loading dock at the facility's Return and Fill Station for up to 24 hours. These drums may not be stacked more than two drums high, and they must remain closed until the used parts washer solvent is transferred from the drums into one of the two drum washer / dumpster units. Used solvent is then pumped from the drum washer / dumpster units into an aboveground permitted hazardous waste storage tank (Tank No. 3). At the end of each business day, residuals are cleaned out of the drum washer / dumpster units and drummed for shipment to an offsite RCRA permitted facility.

SK – Raleigh operates two drum washer / dumpster units that serve as unloading areas for containerized used parts washer solvent and as container cleaning stations at the Return and Fill Station. These drum washer / dumpster units are managed as RCRA Subpart X miscellaneous units. They are designed to allow employees to empty drums or other like containers of used parts washer solvent (petroleum naphtha based mineral spirits and some aqueous based parts cleaners) into the drum washer / dumpster units, rinse the drums via a spray system with used solvent pumped from the drum washer / dumpster unit, and then refill the drums with clean recycled or virgin solvent product. As designed and utilized, these units are simply a device used to convey the contents of a used solvent drum to the on-site storage tank. The drum washer / dumpster units are not designed or intended to treat or store an accumulation of hazardous waste. From these units, the used solvent is transferred to the RCRA permitted aboveground storage tank (Tank No. 3) located in the Tank Farm.

SK – Raleigh estimates that a typical operating day for the drum washer / dumpster units consists of 2.5 to 4 hours of processing. The Permit requires that the units be maintained in a closed position when not actively being used to receive solvent or wash drums during the operating day, and be drained and closed during those times of the operating day when no trucks are delivering used parts washer solvent to be processed. In addition, the drum washer/dumpster units and their internal sumps must be emptied, cleaned, closed and prepared for the next day's operation at the end of each operating day.

The drum washer/ dumpster units operated by the SK branches are not equipped with active emission control systems. According to the Part B Permit Application, SK has performed emissions monitoring of these specific units as well as similar units at other SK facilities and this data has shown that VOC emissions levels are below the 10,000 ppmw leak detection threshold.

During the inspection, inspectors observed an emergency shower and emergency eyewash station at the Return and Fill Station. They also observed one 55-gallon satellite accumulation area (SAA) container used to accumulate dirty rags, gloves, and PPE as hazardous waste branch debris. The container was closed with a flip-top lid, and it was labeled to identify its contents. The inspectors observed several containers of incoming used cleaning compound (petroleum naptha), which was labeled as non-regulated waste.

Tank Farm: The Tank Farm houses five aboveground storage tanks, and is located within a reinforced concrete containment area to the east of the Return and Fill Station. Tank No. 1 is a 15,000-gallon vertical steel aboveground tank used to store used oil; Tank No. 2 is a 10,000-gallon vertical steel aboveground tank to store parts washer solvent product; Tank No. 3 is a 15,000-gallon vertical steel aboveground tank used to store used parts washer solvent, and may also be used to store storm water/washer water collected in the tank farm and the truck station; Tank No. 4 is a 15,000-gallon vertical steel aboveground tank used to store used oil; and Tank No. 5 is a 15,000-gallon vertical steel aboveground tank used to store used oil. According to the Permit, the interior surface of the containment structure has been sealed with an epoxy and/or urethane coating to prevent migration of spilled or leaked materials, and a liquid level detection probe is provided above the associated liquid collection sump. The detection probe is monitored 24/7 by an off-site central monitoring service to detect a catastrophic release from one or more of the storage tanks.

The feed system for Tank No. 3 is a steel piped system which pumps waste from the drum washer / dumpster units, and the feed pump is connected to a high-level alarm system to prevent overfilling of the tank. This permitted hazardous waste storage tank has two 24" man ways – one on top of the tank and one near the base of the tank. The most recent in-service inspection of the tank was performed on 01/17/2014. Required daily inspections of the permitted storage tank and its ancillary equipment are intended to identify leaks by inspecting the sides and bottom perimeter of the tank, including its fiberglass skirting (with viewing ports) and the secondary containment system. The inspections should also evaluate the integrity of the secondary containment base, curbs and sidewalls, sump fill lines and overfill alarm equipment, piping, valves and general tank condition. The piping and ancillary equipment is all above ground and runs primarily overhead. Daily inspections of piping and ancillary equipment should evaluate the integrity of pumps, magnetic couplings, and welded flanges, joints and connections.

SK – Raleigh operates pumps, valves, and pressure relief devices in heavy liquid service, as well as flanges, which are all subject to the inspection and repair requirements specified in 40 CFR 264.1058. A complete list of the identified equipment is found in Appendix F-1 of the Part B Permit Application. Because the used parts washer solvent has a maximum organic concentration of approximately 2,700 ppm in the vapor phase, leaks cannot result in a concentration of more than 10,000 ppm. Therefore, a portable organic vapor analyzer is not used for leak detection at this facility. Instead, SK – Raleigh conducts daily visual inspections of all affected equipment to comply with this standard. If an equipment leak is detected through visual, audible, or olfactory observation, then the piece of equipment is tagged and identified with the equipment identification number and date of leak detection. The leak must be repaired as soon as practicable, but not later than 15 calendar days after it is detected. Although inaccessible connections are specifically exempt from the leak detection monitoring and recordkeeping

requirements under the provisions specified in 40 C.F.R. 264.1058(e), SK – Raleigh has committed to perform annual roof top and upper tank inspections under the Part B Permit Application.

Because SK – Raleigh manages waste that range in volatile organic concentrations up to 100%, all wastes managed in containers and in the storage tank are handled as being subject to CC requirements. The on-site hazardous waste tank system that consists of one 15,000-gallon storage tank (Tank No. 3) and ancillary equipment. Based on the tank dimensions and the maximum vapor pressure of volatile organic materials managed in the tank, Tank No. 3 is subject to CC requirements as a Level 1 Tank with a fixed roof. As a result, the fixed roof and its closure devices should form a continuous barrier over the entire surface area of the hazardous waste in the tank. No visible cracks, holes, gaps, or other open spaces should be present between the roof section and tank wall; or between the perimeter of the opening and the closure device when it is in the closed position. As a result, SK – Raleigh is required to visually inspect the fixed roof and closure devices to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes or gaps in the roof sections; broken, cracked, or damaged seals or gaskets on closure devices; broken or missing hatches, access covers, caps, or other closure devices.

During the inspection, the inspectors observed five above-ground storage tanks in the Tank Farm. Three of the tanks were labeled “Used Oil,” one was labeled “Clean Mineral Spirits,” and the last was labeled “Hazardous Waste Mineral Spirits.” The tanks appeared to be in good condition, and the area was equipped with a spill response kit.

Truck Station: Located adjacent to the Tank Farm, the Truck Station is a concrete paved secondary contained area with a collection sump near the tank farm containment wall. SK trucks load and unload material from the tanks via aboveground pipelines and pipe connections located inside the secondary containment areas. One truck loading / unloading line in the Truck Station is associated with Tank No. 3. This open-ended line remains closed at all times, except when loading and unloading hazardous waste liquids. All valves within the line are welded or flanged, and the open-ended line is equipped with a flanged CAM lock. In order to comply with the standards found in 40 C.F.R. Part 264 Subpart BB, SK – Raleigh conducts daily visual inspections of this line in order to detect any equipment leaks through visual, audible, or olfactory observation.

SK – Raleigh also utilizes the Truck Station area for the temporary storage of containerized hazardous and non-hazardous wastes that is managed as less than 10-day transfer waste. The inspectors observed a 55-gallon SAA container between the Truck Station and the adjacent Tank Farm. The SAA container is used to accumulate dirty rags, gloves, and PPE as hazardous waste branch debris in this area. The container was closed with a flip-top lid, and it was labeled to identify its contents.

10-day Transfer Waste Area: Although 10-day transfer waste may be managed in the permitted container storage areas, in two non-permitted flammable storage sheds, in the tank farm, and in the truck station, SK – Raleigh’s primary location for managing 10-day transfer waste is in the designated Transfer Waste Area. This waste management unit is a covered area next to the Truck

Station, and the inspectors observed yellow lines painted on the paved floor of this unit. The lines defined three long rows and aisle space down the length of the covered area. Rows are large enough to accommodate a series of wooden pallets holding waste containers, and the inspectors observed drums of both hazardous and non-hazardous waste on wooden pallets in these rows. None of the hazardous waste containers appeared to have exceeded the 10-day time limit in this area.

Flammable Storage Sheds: Three metal shelters, which are located northeast of the Administrative Office Building, are utilized for the storage of flammable solvents and paint related wastes and materials. Two of the sheds are positioned side-by-side, but are separated by two distinct metal secondary containment devices. One of these sheds is a RCRA permitted waste storage unit, used to store up to 1,092 gallons of paint waste, fluid recovery system waste, used parts washer solvent, drum washer sediment and dry-cleaning wastes. Container labels must contain, at a minimum, information necessary to identify the waste (i.e. EPA waste codes), along with the generator's name, address, USEPAID number and manifest tracking number (if applicable), and the date when the waste was received at the Facility. The second and third sheds are not permitted waste storage units, and they are primarily utilized for storage of product materials and less than 10-day transfer waste.

The permitted Flammable Storage Shed is equipped with a grating style floor that allows for liquids to drain away from containers, so pallets are not required inside this unit. However, the Permit allows SK - Raleigh to temporarily stage hazardous waste containers during a single 8-hour working shift in order to arrange and palletize like materials in preparation for shipment off-site. Temporary staging occurs in areas such as the service center warehouse and outdoor concrete surfaces within and adjacent to the less than 10-day transfer waste storage shelter. Unless it is done in response to a leak or similar problem, these containers may not be opened, and their contents may not be transferred from one container to another while they are at the SK - Raleigh facility.

During the inspection, the inspectors observed a fire extinguisher, a panic button, and hazard identification signs in the flammable storage shed area. The inspectors observed a number of waste containers within the permitted hazardous waste flammable storage shed, and various containers of product material within the other two flammable storage sheds. During the inspection, the permitted hazardous waste flammable storage shed contained two 55-gallon drums of hazardous waste paint related material, dated 08/13/2018; seven 5-gallon pails of hazardous waste paint related material, dated 08/08/2018 or newer; twenty-seven empty 5-gallon pails; and one 55-gallon drum of Ultra-Kleen equipment solution in the permitted flammable hazardous waste storage shed. This shed also contained two 30-gallon SAA drums, which were both labeled for accumulating hazardous waste aerosols. One of these 30-gallon containers was closed, and dated 05/03/2018. The second was equipped with a flip-top lid, which was in the closed position.

The inspectors noted that the hazardous waste aerosol SAA containers have the combined capacity to hold a total volume of 60 gallons of hazardous waste, although the total volume of waste inside the containers appeared to be less than 55-gallons. The first SAA container, which was closed and dated, appeared to be full, but the second container appeared to contain less than

25 gallons of hazardous waste. Please note that the SAA Permit Exemption allows a generator to accumulate up to 55-gallons of hazardous waste in a SAA. According to 15A NCAC 13A .0107 (2016) [40 C.F.R. § 262.34(c)(2) (2016)], which is a condition of the SAA Permit Exemption, a generator who accumulates hazardous waste in excess of 55-gallons at or near any point of generation must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating, and must comply with paragraphs (c)(1)(i) and (ii) of this section (i.e. move the excess volume of hazardous waste to the less than 90-day hazardous waste storage area) within three days.

Double-Walled Frac Tanks: The facility also maintains and operates two self-contained (steel, double walled) 18,000-gallon Frac Tanks located at the northeast portion of the concrete vehicle parking lot within the active portion of the facility. These bulk containers are utilized solely to transfer and accumulate used oil and used oil related wastewaters generated by commercial and industrial customers. These materials are temporarily accumulated and subsequently transferred to bulk tanker trucks and transported off-site for recovery and/or treatment. The tanks appeared to be in good condition, and the area was equipped with a spill response kit.

Blue Outbuilding: The inspectors entered the blue outbuilding, which is located outside the fenced portion of the SK – Raleigh facility. Containers of lubricant product are stored inside the building, but no containers of hazardous wastes were observed in this area during the inspection.

Records Review: The records reviewed include waste profiles, hazardous waste manifests, land disposal restriction (LDRs) certificates, biennial reports, hazardous waste training records, daily and weekly inspection records, and the contingency plan. According to SK's hazardous waste certification, dated 08/04/2015, analytical sampling results indicated that the waste parts washer solvent stored in Tank No. 3 meets the RCRA definition of "in heavy liquid service."

Inspectors reviewed a random sample of available hazardous waste manifests, and noted that SK – Raleigh shipped waste combustible liquid (petroleum naptha) as D001 / D018 / D039 / D040 to SK Lexington (SCD 077 995 488) and to SK Smithfield (KYD 053 348 108) on manifest numbers 006457932SKS and 006457910SKS, respectively. SK – Raleigh also shipped waste combustible liquid (petroleum naptha) as D001 / D004 / D005 / D006 / D007 / D008 / D010 / D011 to Clean Harbors Deerpark (TXD 055 141 378) on manifest number 006457911SKS. However, incoming shipping documents indicated that SK – Raleigh transported both used cleaning compounds (petroleum naptha) and used cleaning compound aqueous solution as non-EPA regulated materials.

The facility's hazardous waste training records included the job title and job description for the Branch General Manager, the Customer Service Manager, the Branch Dispatcher, the Branch Secretary, the Oil Sales and Service Representative, and the Vacuum Sales and Service Representative. The Permit also identified job titles for the Sales and Service Representative, the Lead Warehouseman, and the Warehouseman, and job descriptions for the Lead Administrative Assistant, the Lead Material Handler, the Material Handler, the Customer Service Representative, the Senior Customer Service Representative, the Market Sales Specialist – Hunter, and the Market Sales Specialist – Farmer. The inspectors highly recommend that SK – Raleigh review the list of job titles and the job titles associated with the job descriptions to

ensure that the information is uniform and consistent.

SK – Raleigh’s required HAZWOPER and related training is conducted during routine monthly training events. The program includes both online and classroom modules, and annual RCRA refresher training is conducted in January of each year. According to the facility’s records, the most recent RCRA refresher training was completed by SK – Raleigh’s seventeen employees on 01/04/2018. In addition, fourteen SK – Raleigh employees, including the three individuals named as Emergency Coordinators for the facility, participated in an annual contingency plan drill on 01/22/2018.

According to the Permit, SK – Raleigh is required to perform daily visual inspections of the Tank Farm, the Truck Station Area, the Return and Fill Station, the Drum Washer / Dumpster Units, the East and West Container Storage Rooms, and the Flammable Waste Storage Shed. The Permit also requires daily testing of high level alarms for Tank No. 3, and weekly visual inspections and certain testing of safety and emergency equipment, security devices, and miscellaneous equipment. A record of each inspection must be maintained for review for a period of at least three years. At a minimum, these records must include the date and time of the inspection, the inspector’s name, a notation of the observation made and the date and nature of any repairs or other remedial actions taken. Mr. Leonard explained that daily inspections are performed on an iPad or an iPhone, and the records are kept electronically. The inspectors noted that the recordkeeping database included inspection records for the Return and Fill Area, the Flammable Waste Storage Sheds, the Covered Transfer Waste Area, the East Drum Storage Area, the West Drum Storage Area, the Outdoor Tank Farm, the Tank System, the Tank Secondary Containment, and the Frac Tanks. Mr. Leonard explained that required weekly inspections are done once per week during the daily inspection rounds. Although the database showed that daily inspections appeared to be recorded in the required areas during the past month, Mr. Leonard was not able to access the detailed records for each inspection during the inspection.

SK – Raleigh’s contingency plan was submitted as Section G in the approved Part B Permit Application. The plan was most recently modified on 04/30/2015, when SK – Raleigh updated the list of Emergency Coordinators. The plan includes a description of the emergency response procedures, a list and description of emergency response equipment and its location, documentation of coordination agreements, evacuation routes, and names and contact information of emergency coordinators for the facility.

11) Out-Briefing

The inspectors conducted the exit meeting with Mr. Leonard. During this meeting, the inspectors stated their preliminary observations from the inspection.

12) Conclusion

Based on the observations made during the inspection, SK – Raleigh should address deficiencies related to the following requirements:

- Pursuant to 15A NCAC 13A .0119 [40 C.F.R. § 273.13(d)(1)], a “Small Quantity Handler of Universal Waste” (SQHUW) must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
- Pursuant to 15A NCAC 13A .0119 [40 C.F.R. § 273.15(a)], a SQHUW may accumulate universal waste for no longer than one year from the date the universal waste is generated.

13) **Signed**

for Alan A. Annicella

Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

10/22/18
Date

Concurrence

Alan A. Annicella

Alan A. Annicella
Chief, Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

10/22/18
Date