



RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	5/20/2024	Inspection Announced: No
Facility or Site Name: Safety-Kleen A Clean Harbors Company		
Facility/Site Physical Location: 1200 Sylvan St		
(city, state, zip code) Linden, NJ 07036-6418		
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	David D. Cornell	Sr. Environmental Compliance Manager
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	934.777.1175	
RCRA ID Number: NJD002182897		
Facility/Site Personnel Participating in Inspection:		
David D. Cornell	Above	Above
William Greenlaw	Facility Manager II	greenlaw.william@cleanharbors.com
Inspector(s):		
William Chernes	WILLIAM CHERNES  Digitally signed by WILLIAM CHERNES Date: 2024.07.25 17:03:30 -04'00'	
Supervisor:		
Derval Thomas	DERVAL THOMAS  Digitally signed by DERVAL THOMAS Date: 2024.07.25 16:57:56 -04'00'	

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

The purpose of the inspection was to determine the facility’s compliance with the Resource Conservation and Recovery Act (RCRA). The inspection was conducted by EPA RCRA inspector William Chernes and inspector-in-training Kiran Jain.

Opening Conference

EPA Region 2 RCRA inspector William Chernes and inspector-in-training Kiran Jain arrived at the Safety-Kleen facility on May 20, 2024, for an unannounced inspection. They met with Mr. David Cornell, Sr. Environmental Compliance Manager, and Mr. William Greenlaw, Facility Manager II, at the opening conference of the inspection. EPA presented its credentials to Mr. Cornell and Mr. Greenlaw and informed them that this was an EPA inspection to determine the facility's compliance with RCRA. The scope of the inspection was a compliance evaluation inspection (CEI).

Facility/Site Description

Safety-Kleen is a subsidiary of Clean Harbors operating in over 200 locations across the United States. The company offers services and products in waste disposal, parts cleaning, used oil recycling, and vacuum services. The site visited on this inspection is located in Linden, New Jersey. At this site, their main source of hazardous waste is selling and recycling solvents and lubricant oils. The site has four main waste storage areas: one central accumulation warehouse, two tank farms, and one column pad. After review of the manifest information and statements made by facility representatives, the facility was determined to be a Treatment, Storage, and Disposal Facility (TSDF) of hazardous wastes at the time of the inspection.

SECTION II – OBSERVATIONS

Central Accumulation Area


The 90-day storage area, located inside a warehouse, is where the facility stores their hazardous waste and non-hazardous waste drums. At the time of inspection, there were six 55-gallon drums of hazardous paint waste observed. Each drum was properly closed, labeled, and dated.

Tank Farm #2

Tank Farm #2 is divided into two separate pads: T201-T215 and T40-41. Both contain tanks storing hazardous waste. Facility representatives stated that they conduct daily, monthly, and annual inspections of all tanks on site.

Tanks T201-T215

This subset of Tank Farm #2 contains eight tanks storing various organic compounds and solvents from Safety-Kleen's customers. There are also five tanks containing crude mineral spirits, and two fuel blending tanks. At the time of inspection, the hazardous wastes observed in the area were as follows:

- T202 & T207 – two 17,100-gallon tanks of decalin
- T203 - one 17,100-gallon tank of propylene glycol monomethyl ether acetate 

- T204 – one 9,500-gallon tank of thinner
- T205 – one 9,500-gallon tank of acetone
- T209 – one 9,500-gallon tank of QSol
- T210 – one 9,500-gallon tank of FFH
- T215 – one 19,000-gallon tank of acetonitrile salted
- T201, T206, & T208 – three 17,100-gallon tanks of crude mineral spirits
- T211 & T212 – two 28,500-gallon tanks of crude mineral spirits
- T213 – one 28,500-gallon dual media filter tank
- T214 – one 28,500-gallon fuel tank

There were several 5-gallon hazardous waste satellite drums placed around the pad. Facility representatives stated that they were mainly used for filter cakes and cleanup. Rags used to clean up solvent had been placed in a trash bag that was not labeled, closed, or compatible to store hazardous waste. There were two red-tagged pumps that had been out of service for over 15 days and appeared to have been leaking. Sludge material was built up on the outside of the pumps. EPA inspectors noticed that the secondary containment on the floor inside the tank area had several cracks and the previously applied epoxy liner had eroded in many locations.

Tanks T40-T41

This subset of Tank Farm #2 contains two customer tanks storing hazardous waste. At the time of inspection, the observed hazardous wastes were as follows:

- T-40 – one 17,100-gallon tank of acetone
- T-41 – one 16,640-gallon tank of N-Methyl-2-pyrrolidone

The epoxy liner in the secondary containment had eroded in several locations. There was one BB line that was not double capped nor had two valves in series. EPA inspectors witnessed facility representatives place a cap on the line immediately after the concern was identified.



Column Pad (CT-1, CT-2, & T-75)

The Column Pad contained two distillations columns (CT-1 & CT-2) and one wastewater tank (T-75). The wastewater tank is non-hazardous. In the area, there were four leaking pumps that had not been red tagged. Three 5-gallon satellite drums were not properly labeled with the hazards of their contents, and two of the drums were not properly closed, shown in Figure 1. There were 14 bleeders that did not have double closed valves. EPA inspectors witnessed a facility representative add a large cap to one of the valves immediately after the concern was identified. Cut Tanks 1 & 2 had four open-ended BB lines. Several lines of mixed solvents were leaking into a trough in the area, and an unidentifiable vial was found knocked over without a cap, shown in Figure 2. EPA inspectors witnessed facility representatives begin to clean the spill immediately after the concern was identified. Tank 75 was missing a valve cap and had corrosion

on the exterior, shown in Figures 3 & 4. There were cracks in the secondary containment surrounding the tank. There was one 55-gallon hazardous waste drum just outside the Column Pad that was corroded and did not contain labeling that indicated the hazards of the contents, shown in Figure 5.

Tank Farm #4 (T4401-T4404)

Tank Farm #4 contains four tanks of customer waste. The observed hazardous waste was as follows:

- T-4401 – one 28,500-gallon tank of used oil
- T-4402 – one 28,500-gallon tank of acetonitrile 
- T-4403 – one 17,100-gallon tank of acetonitrile
- T-4404 – one 20,500-gallon tank of N-Ethylpyrrolidone 

The floor of the tank farm had no secondary containment lining. EPA inspectors noticed soiled rags left on the floor, appearing to have been used to clean up a spill. There was also an unidentifiable open vial knocked over on the floor near the rags, shown in Figure 6. A 5-gallon hazardous waste satellite drum in the area was corroded and did not contain labeling that indicated the hazards of the contents, shown in Figure 7. Tank 4403 was pitting near the base, shown in Figure 8. There was also pitting on the floor under the staircase leading into the tank farm, shown in Figure 9.

Record Review

- Manifests and land disposal restriction forms
After review of the manifests and land disposal restriction forms, there were no discrepancies to report.
- Personnel training
The personnel training was documented and recorded, there were no discrepancies to report.
- Contingency plan
The contingency plan was properly documented and maintained, no concerns.
- Arrangements with local authorities
The facility had made arrangements with the required authorities, which includes the local fire department, police department, and hospital.
- Tank area inspection records
Tank inspection records were consistently documented and recorded; however, all secondary containment systems were marked as “passing”, despite EPA inspectors observing several tank areas with inadequate lining at the time of inspection.
- Permit applications

Permit applications records were properly documented, no concerns.

- Leak Detection and Repair (LDAR) for BB & CC equipment
LDAR documentation was properly recorded, no concerns.

- Waste Analysis Plan (WAP)

The WAP was properly documented and up to date, no concerns.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. Pursuant to 40 C.F.R. §267.191(c)(2), as incorporated by reference in N.J.A.C. 7:26G-6.1 states that the type and degree of external corrosion protection needed to ensure the integrity of the tank system during the use of the tank system or component, consisting of one or more of the following:

- (i) Corrosion-resistant materials of construction such as special alloys, fiberglass reinforced plastic, etc.
- (ii) Corrosion-resistant coating (such as epoxy, fiberglass, etc.) with cathodic protection (for example, impressed current or sacrificial anodes) and
- (iii) Electrical isolation devices such as insulating joints, flanges, etc.

At the time of the inspection, Tank 4403 in Tank Farm #4 was pitting near the base.

2. Pursuant to 40 C.F.R. §264.195(b), as incorporated by reference in N.J.A.C. 7:26G-6.1 states that secondary containment systems must be, at a minimum:

- (1) Constructed of or lined with materials that are compatible with the wastes(s) to be placed in the tank system and must have sufficient strength and thickness to prevent failure owing to pressure gradients (including static head and external hydrological forces), physical contact with the waste to which it is exposed, climatic conditions, and the stress of daily operation (including stresses from nearby vehicular traffic).

- a. At the time of the inspection, the secondary containment inside Tank Farm #2 (T201-T215) had several cracks and the previously applied epoxy liner had eroded in many locations.
- b. At the time of the inspection, the epoxy liner in the secondary containment inside Tank Farm #2 (T40 & T41) had eroded in many locations.
- c. At the time of the inspection, there were cracks in the secondary containment surrounding Tank 75 in the Column Pad.
- d. At the time of the inspection, the floor inside Tank Farm #4 had no secondary containment lining.
- e. At the time of the inspection, there was pitting in the secondary containment under the staircase leading into Tank Farm #4.

3. Pursuant to 40 C.F.R. § 265.31, as incorporated by reference in N.J.A.C. 7:26G-6.1 states that facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
 - a. At the time of the inspection, in Tank Farm #2, there were 2 red-tagged pumps that had been out of service for over 15 days. Leaking and sludge build up was observed.
 - b. At the time of the inspection, several lines of mixed solvents had been leaking into a trough in the Column Pad, and an unidentifiable open vial was also found knocked over in the area.
 - c. At the time of the inspection, in Tank Farm #4, soiled rags had been identified within the secondary containment on the ground, appearing to have been used to clean up a spill. There was also an unidentifiable open vial knocked over on the floor near the rags.

4. Pursuant to 40 C.F.R. § 262.15(a)(1), as incorporated by reference in N.J.A.C. 7:26G-6.1 (a) states that if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition and does not leak, or immediately transfer and manage the waste in a central accumulation area operated in compliance with [§ 262.16\(b\)](#) or [§ 262.17\(a\)](#).
 - a. At the time of the inspection, there was one 55-gallon hazardous waste drum just outside the Column Pad that was corroded.
 - b. At the time of the inspection, one 5-gallon hazardous waste satellite drum in Tank Farm #4 was corroded.

5. Pursuant to 40 C.F.R. § 262.15(a)(2), as incorporated by reference in N.J.A.C. 7:26G-6.1 (a) states that the generator must use a container made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be accumulated, so that the ability of the container to contain the waste is not impaired.

At the time of the inspection, rags used to clean up solvent in Tank Farm #2 had been placed in a trash bag that was not compatible with hazardous waste.

6. Pursuant to 40 C.F.R. § 61.242-7(d)(1) as incorporated by reference in N.J.A.C. 7:26G-6.1 (a) states that when a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in [§ 61.242-10](#).

At the time of the inspection, in the Column Pad, there were four leaking pumps that had not been red tagged for repair.

7. Pursuant to 40 C.F.R. § 262.34(a)(3), as incorporated by reference in N.J.A.C. 7:26G-6.1 (a) states that a container must be labeled with the words “Hazardous Waste” and “[a]n indication of the hazards of the contents”.
 - a. At the time of the inspection, three 5-gallon satellite drums in the Column Pad were not labeled with an indication of the hazards of the contents.
 - b. At the time of the inspection, there was one 55-gallon hazardous waste drum just outside the Column Pad that did not contain labeling that indicated the hazards of the contents.
 - c. At the time of the inspection, one 5-gallon hazardous waste satellite drum in Tank Farm #4 did not contain labeling that indicated the hazards of the contents.

8. Pursuant to 40 C.F.R § 265.173(a), as referenced by 262.34(a)(4), as incorporated by N.J.A.C 7:26G-6.1, states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, two 5-gallon satellite drums in the Column Pad were not fully closed.

9. Pursuant to 40 C.F.R § 264.1056(a), as referenced by 262.34(a)(4), as incorporated by N.J.A.C 7:26G-6.1, states that
 - (1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve.
 - (2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring hazardous waste stream flow through the open-ended valve or line.
 - a. At the time of the inspection, there was one BB line in Tank Farm #2 (T40-T41) that was not capped nor had two valves in series.
 - b. At the time of the inspection, there were 14 bleeders in the Column Pad that did not have double closed valves.
 - c. At the time of the inspection, Cut Tanks 1 & 2 in the Column Pad had four open-ended BB lines.

General Concerns

At the time of the inspection, Tank 75, which contained non-hazardous wastewater, was missing a valve cap, and had corrosion on the exterior.

Closing Conference

Inspector Chernes and inspector-in-training Jain went over the compliance evaluation inspection that had just been conducted at the facility and discussed the areas of concern that were observed at the time of the inspection. Facility representatives stated that they would send any records that were not available upon request. In a series of emails sent on June 10, 2024, and June 14, 2024, Mr. Cornell sent the following requested records:

- Subpart BB annual visual pump inspections
- Annual Subpart CC top of tank inspections 2023/24
- Initial tank inspections for all hazardous waste tanks
- External hazardous waste tank inspections 2023/24
- Secondary containment inspections for RCRA permitted Tank Farms 2, 4, 40/41
- Vapor pressure for each hazardous waste tank
- Pictures of capped/double valved bleeder valves for Cut Tanks 1 & 2 (in the column area, Tank Farm #2 and 40/41 and Column Areas
- Pictures of cleaned secondary containment areas for Tank Farm #2, 4, 40/41 & Columns
- Pictures of tank painting and spot fixes for coating failure on Tanks 75 & 4403
- Completed repair work orders for leaking pumps and pictures
- Schedule of repairs for secondary containment coating
- Clean close documents for out-of-service tanks

Figures:



Figure 1: Three 5-gallon satellite hazardous waste drums were not properly labeled in the Column Pad. Two of the drums were also not properly closed.

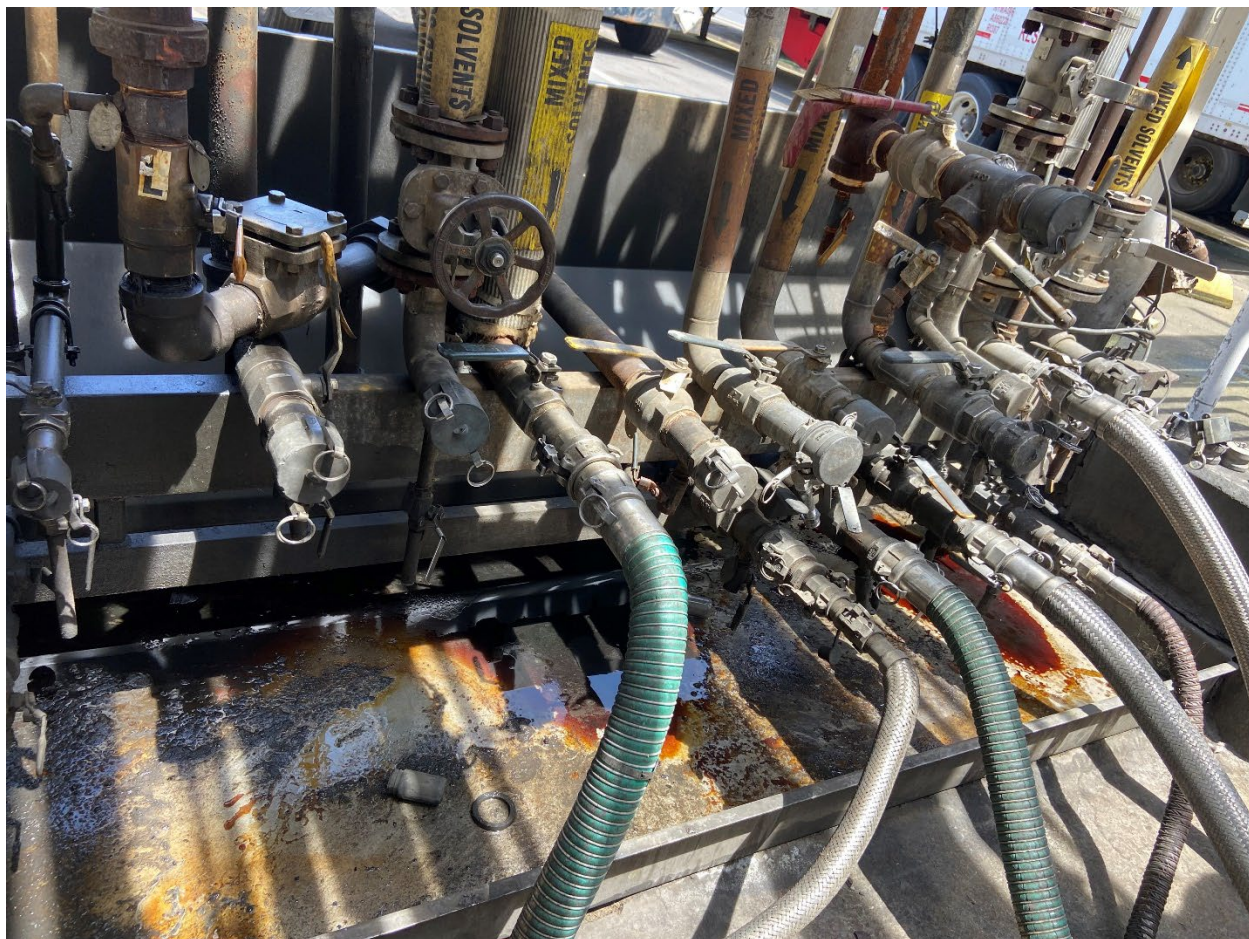


Figure 2: Trough in the Column Pad containing leakage from solvent pipes and an unidentifiable open vial on its side.



Figure 3: Corrosion and open valve on wastewater Tank 75 in the Column Pad.



Figure 4: Corrosion along the side of Tank 75 in the Column Pad.



Figure 5: Corrosion and improper labeling on 55-gallon hazardous waste drum outside the Column Pad.



Figure 6: Soiled rags and open vial on its side on the floor inside Tank Farm #4.



Figure 7: Corroded 5-gallon satellite hazardous waste drum with improper labeling inside Tank Farm #4.



Figure 8: Pitting at the base of Tank 4403 in Tank Farm #4.



Figure 9: Pitting beneath the staircase leading into Tank Farm #4.