



REGION 6

DALLAS, TX 75270

3/10/2025

SENT BY ELECTRONIC MAIL

robertson.donald@cleanharbors.com

Scott Robertson
Facility General Manager II
Clean Harbors Colfax
3763 Highway 471
Colfax, LA 71417

Re: Notice Letter
Resource Conservation and Recovery Act
Clean Harbors Colfax

Dear Mr. Scott Robertson:

Hazardous waste that is improperly managed poses a serious threat to human health and the environment. Through implementation of the authorities in the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 – 6992k, the United States Environmental Protection Agency (EPA) regulates hazardous waste activities from the “cradle-to-grave.” This includes the generation, transportation, treatment, storage and disposal of hazardous waste.

On December 16, 2024, EPA, Region 6 conducted an inspection at Clean Harbors facility located in Colfax, LA. The purpose of the inspection was to determine Clean Harbors Colfax’s compliance with the requirements of RCRA, and the implementing regulations. The information currently available to EPA, collected as a result of the inspection, suggests that Clean Harbors Colfax may be in violation of RCRA.

RCRA Violations

By this letter, EPA is extending Clean Harbors Colfax the opportunity to advise EPA, in person, via a conference call, or in writing, of any further information EPA should consider with respect to the following potential violations of RCRA and the implementing regulations¹:

¹ On January 24, 1985, the State of Louisiana received final authorization for its base Hazardous Waste Management Program (50 FR 3348). Subsequent revisions have been made to the Louisiana Hazardous Waste

1. Open containers – Failure to close containers holding hazardous waste during storage, except when it is necessary to add or remove waste, pursuant to 40 C.F.R. § 264.173(a) and LAC 33:V.2107.A.
2. Unlabeled containers – Failure to mark or label containers with the words “Hazardous Waste” while the hazardous waste is being accumulated on-site pursuant to 40 C.F.R. § 262.34(a)(3) and LAC 33:V.1109.E.1.d.
3. Hazardous waste determination – Failure to determine whether solid waste is a hazardous waste for untreated wastewater, several containers, and a cardboard box pursuant to 40 C.F.R. § 262.11 and LAC 33:V.1103.
4. General requirements for ignitable, reactive, or incompatible wastes – Failure to place “No Smoking” signs conspicuously wherever there is a hazard from ignitable or reactive waste pursuant to 40 C.F.R. § 264.17(a) and LAC 33:V.1517.A.
5. Accumulation time – Failure to accumulate hazardous waste on-site for 90 days or less pursuant to 40 C.F.R. § 262.262.34(a) and LAC 33:V.1109.E.1.

Please review the additional information we have provided in the Enclosure.

Opportunity to Confer

This Notice provides you with the opportunity to confer with EPA within **10 business days** of receipt of this Notice, with respect to the above listed alleged violations. We request Clean Harbors Colfax contact Elizabeth George, Assistant Regional Counsel, at george.elizabeth.a@epa.gov or (214) 665-6751.

Program and authorized by the EPA. Except as otherwise provided, all citations found within this Notice Letter are to the “EPA-Approved Louisiana Statutory and Regulatory Requirements Applicable to the Hazardous Waste Management Program” dated November 2015, incorporated by reference under 40 C.F.R. § 272. 951(c)(1)(i) effective on December 26, 2018. 83 Fed. Reg. 66143 (December 26, 2018); 40 C.F.R. 272. 951: Louisiana State-Administered Program: Final Authorization. References and citations to the “EPA-Approved Louisiana Statutory and Regulatory Requirements Applicable to the Hazardous Waste Management Program” may vary slightly from the State of Louisiana’s published version. The corresponding C.F.R. citations are also provided.

Sincerely,

Jeff Yurk, Manager
Waste and Chemical Enforcement Branch

Enclosure/Attachment: Additional Sources of Information

cc: jimbo.earles@la.gov
zachary.adams@la.gov

ADDITIONAL SOURCES OF INFORMATION

- Information on RCRA and hazardous waste regulations
<https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-regulations>
- RCRA Civil Penalty Policy
<https://www.epa.gov/enforcement/resource-conservation-and-recovery-act-rcra-civil-penalty-policy>
- Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, 40 C.F.R. Part 22
https://www.epa.gov/sites/production/files/2013-10/documents/final-crop-fr_1.pdf
- Small Business Fact Sheet
www.epa.gov/compliance/small-business-resources-information-sheet