

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

SAFETY-KLEEN SYSTEMS, INCORPORATED

734 North West Bypass 66
Springfield, Missouri 65802
417-324-8838

EPA ID Number: MOD000669069

On

April 23, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Safety-Kleen Systems, Incorporated located in Springfield, Missouri, on April 23, 2024. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act, as amended. During the CEI, I collected information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on information obtained prior to and during the inspection, I inspected the site as a Large Quantity Generator (LQG) of Hazardous Waste; a hazardous waste transporter and 10-day transfer facility; a RCRA-permitted treatment, storage, and disposal facility (TSDF); a used oil generator, transporter, and transfer facility; and a Small Quantity Handler of Universal Waste.

2.0 PARTICIPANTS

Safety-Kleen Systems, Inc (Safety-Kleen):

Emilly DeVore, Senior Environmental Compliance Manager

Jeff Covington, General Manager

Dustin Walker, Service Delivery Manager

Missouri Department of Natural Resources: (MDNR) - Southwest Regional Office (SWRO)

Wesley Hargraves, Environmental Specialist

U.S. Environmental Protection Agency: (EPA)

Trevor L. Urban, Environmental Scientist (Lead Inspector)

Amy Thompson, Life Scientist

3.0 INSPECTION PROCEDURES

Ms. Amy Thomson and I met with Mr. Wesley Hargraves, at his MDNR-SWRO office at ~8:35 a.m. and discussed the inspection procedures and format that I would follow, as well as any facility issues or concerns and regulatory history. We then proceeded to the facility, arriving at approximately 8:50 a.m. The facility was visible from the parking lot and no apparent issues were observed. Ms. Thompson, Mr. Hargraves and I entered the visitor's entrance, and met with Mr. Jeff Covington. I introduced myself, presented my business card, and explained the purpose of my visit. I asked Mr. Covington if Ms. Emily DeVore was available. Ms. DeVore was listed as site contact on the Notification Acknowledgement/Verification Report form (Attachment 1). Mr. Covington escorted us to a conference room and contacted Ms. DeVore, to let her know I was at the facility. I was greeted by Ms. DeVore and Mr. Dustin Walker, and I explained the purpose of the CEI to Ms. DeVore and Messrs. Covington and Walker.

During the entry briefing, I presented my business card and EPA credentials to Ms. DeVore and Messrs. Covington and Walker. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, they would be presented with a Confidentiality Notice (Notice) with which they could make or not make a claim of confidentiality for the facility. I also provided to Ms. DeVore and Messrs. Covington and Walker a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

A copy of each of the following documents was left with Ms. DeVore and Messrs. Covington and Walker during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Notice Regarding Proprietary/Confidential Business Information

I reviewed the Verification Report with Ms. DeVore and Messrs. Covington and Walker (Attachment 1). Based on this review, I made no changes to the Verification Report.

I conducted a visual inspection of the facility. Ms. DeVore and Messrs. Covington and Walker accompanied Ms. Thompson, Mr. Hargraves and me during the visual inspection. After the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, waste profiles, waste tracking and inventory records, inspection records, contingency plan and training documentation. I also inspected the facility for compliance with their RCRA permit. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Ms. DeVore and Messrs. Covington and Walker. During the exit briefing, I provided Ms. DeVore with a Confidentiality Notice and Receipt for Documents and Samples which she signed as acknowledgement of receipt (attachments 2 and 3 respectively). No confidentiality claims were made by Safety-Kleen.

No findings were observed at the time of the inspection. Therefore, a Notice of Preliminary Findings (NOPF) was not left with Safety-Kleen.

A map of the facility obtained during the CEI is included in Attachment 4, and Google Earth aerial photographs of the facility is included as Attachment 5. The 8 photographs taken during the CEI are included in Attachment 6. I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently.

4.0 FACILITY DESCRIPTION

4.1 Facility General Information

Safety-Kleen began operations at its current location in 1974. The facility is located in northwest Springfield, Missouri, in an industrial zoned area. The facility consists of an operations building with approximately 4,500-square-feet (sq.ft.) and an office building with approximately 3,000-sq.ft., two open-air tank areas (used oil management and virgin/spent solvent storage), a hazardous waste container storage building, a flammable storage shelter and a return and fill shelter, on an approximately 3-acre site. The northern tank enclosure includes one 12,000-gallon and two 15,000-gallon aboveground storage tanks (AST) within a concrete secondary containment area used for clean and dirty solvent and used oil storage. A second used oil collection open-air tank area is located directly south of the clean and dirty solvent ASTs and utilizes a steel secondary containment system. The second used oil collection tank area consist of two 15,000-gallon ASTs and one 10,000-gallon AST. The facility has approximately 14 full-time employees who work one shift, 7:00 a.m. to 5:00 p.m., Monday through Friday.

Safety-Kleen provides environmental services to customers in a variety of industries. These services include distribution of parts washers and solvents; maintenance of parts washers; collection of spent solvents and aqueous solutions from parts washers and painting applications; used glycol coolant (antifreeze), used oil, and used oil filter collection; vacuum truck services; and collection of containerized hazardous and nonhazardous waste. Wastes collected by Safety-Kleen personnel are transported to the facility for storage prior to shipment off site for recycling, reclamation, treatment, destruction, or disposal.

Safety-Kleen was issued a RCRA hazardous waste management permit on December 23, 2019, and the permit is effective for 10 years. RCRA Permit Condition II.B. authorizes a container storage warehouse for hazardous waste storage with a capacity of 3,136 gallons and a flammable material storage shelter for flammable hazardous waste storage with a capacity of 2,186 gallons. RCRA Permit Condition III.B. authorizes a single hazardous waste storage tank for spent solvent with a capacity of 15,000 gallons (Attachments 4 and 7).

Safety-Kleen is a wholly-owned subsidiary of Clean Harbors, Inc. (Clean Harbors). Safety-Kleen shares office and outdoor space with Clean Harbors Technical Services staff; however, Safety-Kleen and Clean Harbors operate as distinct business units. Clean Harbors Technical Services operates a less-than-10-day hazardous waste transfer facility for hazardous wastes other than the core wastes within the footprint of Safety-Kleen's 4,500 sq.ft. product storage area building. The Safety-Kleen less-than-10-day transfer waste is currently being managed inside a 54-foot semi box

trailer located on the south side of the product storage building. The 54-foot semi box trailer was fitted with a seamless steel pan on the floor as a secondary containment structure (Attachment 5 and Attachment 6 photograph 6).

Wastes from Safety-Kleen's primary business activities are identified as core wastes. Core wastes identified in the permit include spent parts washer solvents, aqueous parts cleaner waste, waste paint related material (WPRM), solvents from immersion cleaners, dry cleaning wastes, and photographic waste. No photographic or dry cleaning wastes were observed during this inspection, and it is not discussed further.

Core wastes are recharacterized annually, per the facility's Waste Analysis Plan. Manifests for core wastes are terminated upon arrival at the facility and placement of the waste into storage. These wastes become branch-generated wastes (that is, wastes that are generated by Safety-Kleen and count toward the facility's hazardous waste generator status) when shipped from storage to their ultimate destination. Other branch-generated wastes include wastes from routine facility operations such as sediment from the return "dumpster," tank sediment, branch debris, and retained used oil samples that had been analyzed for used oil fuel specifications. Ms. Devore provided me with a list of branch-generated and terminated wastes currently being stored on-site with their respective profile numbers and provided additional profile information is in the waste inventory spreadsheet with the corresponding hand written waste streams (Attachment 8). Ms. Devore also provide me with a screen shot of the hazardous waste loads currently being built for off-site as well as a summary detail for the hazardous waste loads currently being built for off-site shipment by destination, hazardous class and total weight shipment (Attachments 9 and 10 respectively).

Ms. DeVore that the Safety-Kleen less-than-10-day transfer waste that is currently being managed inside a 54-foot semi box trailer located on the south side of the product storage building is managed separately, and provided me the current facility waste inventory via e-mail after the conclusion of the CEI (Attachment 11).

Because of the number of wastes generated and managed at the facility, this report includes descriptions of only the highest volume branch-generated wastes and wastes I visually observed during the inspection. The following description of facility operations should not be considered a comprehensive description of all operations and waste streams.

Spent parts washer solvent, spent aqueous parts washer solution, waste paint related material (WPRM), dry cleaning wastes, used oil, used oil filters, used glycol coolant, waste lamps, and used aerosol cans are transported from customer locations to the facility for storage. Spent parts washer solvent, paint wastes, and dry cleaning wastes have been determined to be hazardous by product and process knowledge and/or testing during annual recharacterization. The facility is permitted to receive spent aqueous parts cleaner solution that is hazardous, but only nonhazardous solution was received in 2024. Used glycol coolant is also managed as nonhazardous waste. Used oil and used oil filters are managed as used oil according to Title 40 Code of Federal Regulations (40 CFR) Part 279. Waste lamps and used aerosol can are managed as universal waste according to 40 CFR Part 273.

Facility operations generate branch debris, dumpster and tank sediment, and used oil retain samples. Branch debris consists of contaminated or potentially contaminated debris, such as personal protective equipment (PPE), absorbent paper, unwanted labeling, or any other solid wastes that may have contacted hazardous waste. Dumpster and tank sediment consists of solids removed from spent parts washer solvent containers, the return dumpster, and the spent parts washer solvent AST. Branch debris and solvent sediment have been determined to be hazardous by product and process knowledge and/or testing during annual recharacterization. Used oil retain samples have been determined to be hazardous waste by product and process knowledge as well as testing. The facility also generates typical office and warehouse trash, which it considers nonhazardous.

On August 3, 2022, MDNR conducted a CEI at Safety-Kleen and cited the following findings:

- Failure to maintain secondary containment system in such a way that it is free of cracks or gaps. – Special Permit Condition III incorporating 40 CFR 264.193(e)(iii). This violation is in reference to the secondary containment in the permitted tank farm.
- Failure to mark a satellite container with the words “hazardous waste” or other words identifying their contents. -10 CSR 25-5.262(2)(C)3 incorporating 40 CFR 262.34(c)(1)(ii). This violation is in reference to the drum of rags in the 10 day transfer area.
- Failure to store unbroken lamps in closed, non-leaking containers or packages that are structurally sound and adequate to prevent breakage. - 10 CSR 25-16.273(1) incorporating 40 CFR § 273.13(d)(1). This violation is in reference to box of universal waste lamps which were open at the time of inspection.

The MDNR issued the facility a letter of Warning (LOW) on December 1, 2022, for the findings and Safety-Kleen responded to the LOW on January 6, 2023. Safety-Kleen described the corrective actions taken to correct the findings and no further action was required (Attachment 12). None of these preliminary findings were repeated during this CEI.

4.2 RCRA Status

Safety-Kleen is identified as a LQG of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per calendar month or accumulating more than 1 kg of acute hazardous waste at any time); a hazardous waste transporter and transfer facility; used oil transporter and transfer facility; and a RCRA-permitted TSDF, on the Verification Report provided by EPA (Attachment 1). I confirmed each of these activities during the CEI. During the CEI, I reviewed manifests and operating record reports for outgoing hazardous waste shipments to confirm the facility’s hazardous waste generator status. I also obtained and reviewed the facility RCRA manifest report for 2024 (Attachment 13). Based on my review, the facility generates approximately 37,514 pounds (17,052 kg) of spent parts washer solvent per month, in addition to other wastes. Based on the above, I concluded the hazardous waste generation rate for Safety-Kleen is well above the LQG threshold.

The facility's RCRA hazardous waste management permit identifies a container storage warehouse for hazardous waste storage with a capacity of 3,136 gallons and a flammable material storage shelter for flammable hazardous waste storage with a capacity of 2,186 gallons. I inspected both areas and they were currently being utilized to store products only. Mr. Covington confirmed that the two areas have been used for product storage for the past 8 years. Mr. Covington also stated they now utilize space in a semi box-truck for 10-day transfer waste and space in the product storage building for the facility generated and terminated wastes.

4.3 Facility Wastes

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and my review of waste shipping documents. Ms. DeVore and Messrs. Covington and Walker accompanied Ms. Thompson, Mr. Hargraves and me during the visual inspection.

Waste determinations, generation rates, and ultimate disposition of hazardous wastes described below were obtained from the facility's Generator Waste Report (Attachment 13) and the 2023 Safety-Kleen facility generator summary spreadsheet that Ms. DeVore provided me via e-mail after the conclusion of the CEI. I reviewed the spreadsheet and converted several of the major waste stream tabs into pdf files (Attachment 14). For the generation rates, I divided the annual totals in the spreadsheet by 12 to obtain an estimated monthly generation rate.

Dumpster and tank sediment - consists of solids cleaned from spent solvent containers, the return dumpster, and the spent parts washer solvent AST. The facility considers dumpster and tank sediment to be hazardous waste (D001, D018, D039, and D040, as applicable) based on product and process knowledge and on testing. Based on the facility's Generator Waste Report and summary spreadsheet (Attachments 13 and 14), the facility generates approximately 192 pounds (87 kg) of dumpster and tank sediment per month.

Dumpster sediment is accumulated in 33-gallon satellite accumulation containers (SACs) in the Return/Fill area, and full containers are transferred to the product storage building and immediately process for off-site shipment. Tank sediment is generated during tank service events. It is transported to Safety-Kleen in Dolton, Illinois, for solvent recovery. During the CEI, I observed two 33-gallon SACs located in the return & fill shelter totaling approximately 47 gallons of hazardous waste solvent sludge (Attachment 6 photographs 1 - 3). Both SACs were closed and labeled as hazardous waste with hazard identification. I discussed the 55-gallon limit of hazardous waste for any SAC location with Ms. DeVore and Messrs. Covington and Walker.

Branch debris - consists of solid wastes, such as PPE, absorbent, labels, paper, and other wastes that have been or could potentially be contaminated with hazardous waste. The facility considers branch debris to be hazardous waste (D001, D004-D011, D018-D019, F002, F003, and F005, as applicable) based on product and process knowledge and on testing. Based on the facility's summary spreadsheet (Attachment 14), the facility generates approximately 83 pounds (38 kg) of branch debris per month. Branch debris is accumulated in a 55-gallon SAC in the hazardous

waste solvent tank farm area and product storage area, and full containers are transferred to the product storage building and immediately process for off-site shipment. It is transported to Clean Harbors in El Dorado, Arkansas, or Kimball, Nebraska, for incineration.

During the CEI, I observed SACs collecting branch debris in the hazardous waste solvent tank farm area and product storage building area. The SACs were closed and labeled with the words “hazardous waste” and an indication of the nature of the hazard.

Used oil retain samples - are generated when used oil samples that have been retained for confirmation analysis are discarded following expiration of the 90-day hold time. The facility considers used oil retain samples to be hazardous waste (D008, D018, D039, and D040, as applicable) based on product and process knowledge and on testing. The facility generates approximately 225 pounds (102 kg) of used oil retain samples per month. The waste is stored in the west room of the product storage building and transported to Clean Harbors in Kimball, Nebraska, for incineration.

During the CEI, I observed multiple boxes of used oil retains in the west room of the product storage building on shelves. None of the used oil retains were beyond the 90-day expiration date.

Spent immersion cleaner solvent - is generated from servicing of customer immersion cleaners for carburetors and other parts. The facility considers spent immersion cleaner solvent to be hazardous waste (D001, D004-D011, and D018-D043, as applicable) based on product and process knowledge and on testing. The facility generates approximately 1,047 pounds (476 kg) of spent immersion cleaner solvent per month. The waste is stored in the product storage building and immediately process for off-site shipment to Safety-Kleen in Dolton, Illinois, for solvent recovery. I did not observe any spent immersion cleaner solvent during the CEI.

Spent parts washer solvent - consists of spent mineral spirits solvent collected from customers during parts washer servicing. The facility considers spent parts solvent to be hazardous waste (D001, D018, D039, and D040, as applicable) based on product and process knowledge and on testing. Based on the facility’s Generator Waste Report and summary spreadsheet (Attachments 13 and 14), the facility generates approximately 32,512 pounds (14,778 kg) of spent parts washer solvent per month. Containers of spent parts washer solvent collected from customers are delivered to the Return/Fill area where the waste is dumped or pumped into the return dumpster. The containers are scrubbed and rinsed with solvent for reuse. Spent parts washer solvent from containers and the container rinse station is pumped from the return dumpster directly to the 15,000-gallon permitted hazardous waste storage tank. It is transported to Safety-Kleen in Dolton, Illinois, for solvent recovery.

During the CEI, I observed the permitted 15,000-gallon storage tank for spent parts washer solvent (Attachment 4). The storage tank appeared to be structurally sound and no evidence of spills or leaks was observed. The secondary containment that was identified as having visible dimpling/scalding during the previous inspection had been repaired (Attachment 6, Photograph 4). The storage tank was labeled with the words “hazardous waste” and “waste solvent” and held approximately 4-foot five-inches of spent parts washer solvent. I noted no deficiencies with the

management and storage of spent parts washer solvent during the CEI. Additional details about the hazardous waste tank is in Section 4.4 of this report.

Dry cleaning wastes - consist of wastes collected from dry cleaning customers. The facility considers dry cleaning wastes to be hazardous waste (F002, D039, and D040, as applicable) based on product and process knowledge and on testing. Based on the facility's Generator Waste Report and summary spreadsheet (Attachments 13 and 14), the facility generates approximately 100 pounds (45 kg) of dry cleaning wastes every three months. Dry cleaning wastes collected from customers are stored in the permitted CSA upon arrival at the facility. The waste is transported to Clean Harbors located in LaPorte, Texas for disposal. I did not observe any dry cleaning wastes during the CEI.

Aqueous parts cleaning waste – consist of wastes from customer parts washers. The facility is permitted to receive hazardous aqueous parts cleaning waste (D004-D011, D018-D019, D021-D030, and D032-D043, as applicable). The facility did not receive any hazardous aqueous parts cleaning waste during 2023. According to Ms. Devore, the facility generates approximately 66,445 gallons or 553,320 pounds (251,509 kg) per month of nonhazardous aqueous parts cleaning waste. The waste is transported to Veolia in Kansas City, Missouri for treatment.

During the inspection I observed approximately 56 containers of non-hazardous aqueous parts cleaning waste on pallets located in the vacuum tank pad/secondary containment area waiting to be pumped into the vacuum tanks (Attachment 6 Photograph 5). I noted no deficiencies with the management and storage of the aqueous parts cleaning waste during the CEI.

WPRM - consist of spent solvent and paint wastes collected from customers. The facility considers WPRM to be hazardous waste (D001, D018, F003, and F005, other codes as applicable) based on product and process knowledge. Based on the facility's Generator Waste Report and summary spreadsheet (Attachments 13 and 14), the facility generates approximately 1,047 pounds (476 kg) of paint wastes per month. WPRM collected from customers is stored in the permitted CSA upon arrival at the facility. It is transported to Safety-Kleen in Dolton, Illinois for solvent recovery or incineration.

During the CEI, I observed containers of WPRM in the permitted CSA. A discussion of the containers in the CSA is in Section 4.4.

Used glycol coolant - is collected from customers in containers and transported to the facility for storage. According to Ms. Devore, the used glycol coolant is non-hazardous base on knowledge and testing. The facility shipped 1,249 pounds (568 kg) of customer generated used glycol coolant per month to Clean Harbors Recycling in Hebron, Ohio during 2023.

Used oil - is collected from customers in tanker trucks and transported to the facility for storage. The facility manages used oil per requirements of 40 CFR Part 279. After the oil is tested, it is pumped into one of four used oil storage tanks at the facility. Based on the Generator Waste Report, the facility shipped approximately 437,953 gallons or 3.64 million pounds (1.658 million kg) per month. Used oil is transported to Clean Harbors located in Wichita, Kansas, for recycling.

The south used oil collection tank area consists of two 15,000-gallon ASTs and one 10,000-gallon AST or in a 15,000-gallon AST in the northern tank enclosure (Attachments 4 and 5). All used oil ASTs were labeled with the words “used oil” and appeared to be in good condition with no apparent leaks or damage.

Used oil filters - are collected from customers in containers and transported to the facility for storage. The facility manages used oil filters per requirements of 40 CFR Part 279. Used oil filters are accumulated in used oil storage containers located at the south end of the facility (Attachment 5). The facility ships approximately 6,500 pounds (2,955 kg) of used oil filters per month. Used oil filters inside the 2-cubic-yard containers are dumped approximately every two weeks into a large collection container on a truck and are transported to Oil Filter Recyclers in Astoria, Illinois, for recycling.

During the CEI, I observed five 2-cubic-yard used oil storage containers holding used oil filters located at the south end of the facility outside near the south fence line. The containers were all in good condition with no apparent leaks or damage. The containers were labeled with the words “used oil filters.”

Waste lamps - consist of containerized fluorescent, compact fluorescent, halogen, metal halide, ultraviolet, sodium, and other lamps collected from customers. Waste lamps are transported to the facility and stored in the 10-day transfer area. The facility manages all waste lamps as universal waste per requirements of 40 CFR Part 273. The facility did not have any waste lamps in accumulation during the CEI.

Used aerosol cans - consist of unpunctured used aerosol cans generated at the facility from adhesive and paint spray cans. The facility manages all used aerosol cans generated at the facility as a D001 hazardous waste.

During the CEI, I observed one 30-gallon SAC for used aerosol cans in the west room of the product storage building. The container less than half full, closed and labeled with the words “D001 Hazardous Waste.” I noted no deficiencies with the management and accumulation of the used aerosol can waste during the CEI.

General trash - consists of office-type refuse, such as waste packaging materials and food containers. The facility has determined that general trash is nonhazardous based on product knowledge. General trash is accumulated in several containers throughout the facility and then picked up by Republic Services and transported/disposed in the landfill operated by the City of Springfield, Missouri.

4.4 Other Regulatory Requirements

Permitted Hazardous Waste CSA - The facility’s RCRA hazardous waste management permit identifies a container storage warehouse for hazardous waste storage with a capacity of 3,136 gallons and a flammable material storage shelter for flammable hazardous waste storage with a capacity of 2,186 gallons. I inspected both areas and they were currently being utilized to store products only. Mr. Covington confirmed that the two areas have been used for product storage for

the past 8 years. Mr. Covington stated that the hazardous waste is currently managed and stored in the middle of the product storage building. During the CEI, I observed approximately thirty, 5-gallon containers in the middle of the product storage building on a pallet. The 5-gallon containers held waste solvents, cleaners and waste paint related materials and were currently being processed for final shipment/disposal (Attachment 6, Photographs 7 & 8). Used oil filters were observed and are shown in the background of photograph 7. Ms. Devore explained each container is scanned and a second bar code is added to the container that represents which load it will be added to for final disposal. All of the containers were approximately full, structurally sound, closed and labeled with the words “hazardous waste” and an indication of the nature of the hazard. The containers marked with accumulation start dates ranging from April 1, 2024, through April 23, 2024. Ms. Devore stated that truck loads for final disposal are built weekly and that hazardous waste usually does not remain in this area over 60 days.

During the CEI, I asked Ms. Devore and Messrs. Covington and Walker if the CSA was inspected. Ms. Devore stated that Messrs. Covington or Walker inspects the area daily and that the area is a part of the daily hazardous waste tank inspection checklist. Mr. Covington stated the tanks, CSA, and Return/Fill areas are inspected each business day and inspection logs are maintained electronically. I reviewed the inspection logs since the date of the previous CEI, from August 3, 2022, to the present noted no missed inspections or deficiencies. A copy of the inspection log for April 23, 2024, is included as Attachment 15 as an example.

At the time of the CEI, the less-than-10-day transfer waste was being managed inside a 54-foot semi box trailer located on the south side of the product storage building. The 54-foot semi box trailer was fitted with a seamless steel pan on the floor as a secondary containment structure (Attachment 5 and Attachment 6 photograph 6). Ms. Devore stated that the containers in the less-than-10-day transfer area are shipped weekly and provided me a copy of the less-than-10-day inventory record from April 18, 2024, through April 23, 2024, by email after the CEI (Attachment 11).

Permitted Hazardous Waste Storage Tank - Safety-Kleen has a single hazardous waste storage tank with a nominal capacity of 15,000 gallons (Attachments 4 and 5). Based on my review of manifests and operating record reports, approximately 5,000 gallons of waste are removed from the tank per month. At the time of the CEI the gauge on the tank was at four-foot five-inches of waste solvent. The hazardous waste storage tank is included in daily inspections (Attachment 15). During my review of electronic inspections, I noted no missed inspections.

I also reviewed the equipment integrity testing and the annual tank visual inspection reports for the permitted solvent waste tank performed on February 21, 2024, (Attachment 16). I noted no deficiencies during this review.

Uniform Hazardous Waste Manifests - Safety-Kleen scans and retains paper copies of all generated manifests and scans all incoming manifests for branch-terminated and transfer waste containers. I reviewed paper copies of the 2023 manifests and spot checked manifest from August 3, 2022, through December 31, 2022. During the CEI, I did not count the number of generator manifests created by Safety-Kleen. However, I reviewed the RCRA manifest report for 2024, which tracks all waste generated and shipped from the facility in 2024 and noted no deficiencies

(Attachment 13). I also reviewed Safety-Kleen's Hazardous Waste Biennial Report summary for 2023, prior to the inspection and I noted no deficiencies.

Contingency Plan - RCRA General Permit Condition I. requires the facility to comply with 40 CFR Part 264 Subparts C & D, and therefore maintain a Contingency Plan designed to minimize hazards to human health and the environment from fires, explosions, or any sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. During the CEI, I performed a brief review of the Contingency Plan against the content requirements of 40 CFR 264.52 and noted no deficiencies. Ms. Devore provided me with the most current version of the contingency plan dated 2022, via e-mail after the inspection (Attachment 17). Ms. Devore also provided me with the permit modifications for the contingency plan made in 2022, as well as the MDNR approval letter. The modifications include an updated list of emergency coordinators, quick reference guide and letters confirming that the updates were sent to the local emergency agencies (Attachment 18).

The permit requires response equipment and hazard management controls be provided and maintained to allow the facility to operate to minimize possibility of a fire, explosion, or spill, and the facility must maintain emergency response equipment. During the CEI, I observed "no smoking" signs, fire extinguishers, spill response equipment, and other emergency response equipment in the permitted CSA, in the Return/Fill area, and near the hazardous waste storage tank. I noted no concerns with types and availability of emergency response equipment and materials at the permitted CSA and hazardous waste storage tank. I also noted that the CSA had adequate aisle space that allowed movement of personnel and response equipment.

Personnel Training Requirements - RCRA General Permit Condition I. requires the facility to comply with 40 CFR Part 264 Subpart B, and therefore requires personnel training as specified in 40 CFR 264.16 and the facility's training plan to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. During the CEI, I asked Ms. Devore about the training provided at Safety-Kleen. She explained that every employee receives comprehensive hazardous waste handling and emergency response training (including Contingency Plan training) annually. The training is delivered throughout the entire year and employees are required to take training on a monthly basis. I reviewed training content with Ms. Devore and determined that the training provided to personnel meets requirements of the permit. I reviewed electronic training records for Ms. Devore and Messrs. Covington and Walker and no apparent areas of RCRA non-compliance were noted. Ms. Devore provided me with a copy of the facility training plan and the job descriptions for personnel located at the facility (Attachments 19 and 20).

Operating Record - The facility's operating record consists of records such as inspection logs, manifests, and training records, as well as a database maintained by operators. I reviewed the various electronic waste reports maintained at the facility during the CEI (Attachments 8 – 10). After the CEI, Ms. Devore emailed me the 10-Day Transfer Waste Inventory and Summary Spreadsheet for 2023 Waste Generation (Attachments 11 and 14 respectively). These records demonstrate the capability of the database system to track each container from receipt to destination facility. I noted no deficiencies with the facility's operating record during the CEI.

Air Emissions: 40 CFR Part 264 Subparts AA, BB, CC - EPA regulations in 40 CFR Part 264, Subparts AA, BB, and CC apply to Permitted TSDFs. If a TSDF manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards specified in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Safety-Kleen is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a TSDF has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Safety-Kleen is subject to the Subpart BB regulations because the hazardous waste storage tanks (and associated appurtenances) contact hazardous waste with greater than 10 percent organics. Because of the nature and properties of the solvents managed, the hazardous waste storage tanks and appurtenances are considered to be in heavy liquid service.

All tank system components are inspected during daily inspections. I reviewed inspection records during the CEI and noted no missed inspections or identified deficiencies. Ms. Devore provided me with the annual subpart BB and CC inspection checklist during the inspection (Attachment 16). I did not identify any deficiencies related to Subpart BB requirements.

The standards found in Subpart CC apply to TSDFs that manage hazardous waste in containers with organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable because the facility accumulates hazardous waste that contains VOCs in 55-gallon hazardous waste accumulation containers. During the CEI, I determined that Safety-Kleen meets the Subpart CC requirements for containers by using Container Level 1 controls (storage containers between 26 gallons and 122 gallons that are Department of Transportation [DOT]-approved). As stated above, Ms. Devore provided me with the annual subpart BB and CC inspection checklist during the inspection (Attachment 16). I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

4.5 Other RCRA Issues

No additional specific information was requested from the facility during the exit briefing. I provided Ms. DeVore with the following compliance assistance guidance during the exit briefing: Security Awareness (EPA pamphlet), Commercial Motor Vehicle Transportation Security Planning (EPA information sheet), Publications for Small Businesses (EPA booklet), and U.S. EPA Small Business Resources (EPA Fact Sheet). See attachment 21 for the entry/exit briefing checklist. I reviewed all other applicable permit and RCRA requirements, and no apparent areas of RCRA non-compliance were noted.

5.0 SUMMARY

I reviewed all applicable Missouri LQG and permit requirements and did not observe any environmental concerns or areas of RCRA non-compliance. Therefore, a NOPF was not left with Safety-Kleen during the inspection. However, further EPA review may change or add to my findings.

TREVOR
URBAN

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TREVOR URBAN
Date: 2024.06.12
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Trevor Urban, Inspector
ECAD/CB/RCRA, EPA Region 7

Whisnant,
Amber

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Whisnant, Amber
Date: 2024.06.21
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Date: _____

Amber Whisnant, Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments:

1. Notification/Acknowledgement Verification Report (1 page)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Site Map (1 page)
5. Google Earth Aerial Photographs (3 pages)
6. Photographic Documentation (Photolog and 8 Photographs) (5 pages)
7. Facility Permit Dated 12/23/2019 – 12/22/2029 (68 pages)
8. Facility Waste Profiles (12 pages)
9. Containerized Waste Inventory by Truck-Trailer Load Destination on 4/23/2024 (1 page)
10. Weight by Trailer Inventory Load Summary Sheets (8 pages)
11. 10-Day Transfer Waste Inventory (4 pages)
12. SMO Letter of Warning Response Dated 01/06/2023 (21 pages)
13. Safety-Kleen RCRA Manifest Report for 2024 (8 page)
14. Summary Spreadsheet for 2023 Waste Generation (15 pages)
15. Dailey Tank and Hazardous Waste Inspection Dated 04/23/2024 (3 pages)
16. Tank System - BB & CC Inspection (2 pages)
17. Contingency Plan (84 pages)
18. Permit Modifications for Contingency Plan and MDNR Approval Letter (27 pages)
19. Training Plan (4 pages)
20. Job Descriptions (6 pages)
21. Site Entry/Exit Briefing Checklist (1 page)