

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

Clean Earth of Alabama, Inc.
402 Webster Chapel Road
Glencoe, Alabama 35905
Etowah County

EPA ID/Permit No. ALD981020894

Latitude: 33.552002°

Longitude: -85.542002°

NAICS Code: 562211 – Hazardous Waste Treatment and Disposal, 562112 – Hazardous Waste Collection, and 562111 – Solid Waste Collection

SIC: 4953 – Refuse System and 4212 – Local Trucking Without Storage

Website: <https://www.cleanearthinc.com>

3) **Responsible Official**

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4) **Inspection Participants**

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Tarin Tischler, U.S. Environmental Protection Agency, Region 4
Bryan Jones, Environmental Health & Safety Director, Clean Earth of Alabama, Inc.
Brad Phillips, General Manager, Clean Earth of Alabama, Inc.

Celia Mayben, Environmental Health & Safety Manager, Clean Earth of Alabama, Inc.
Corey Holmes, Alabama Department of Environmental Protection (ADEM)
Paul Searcy, ADEM

5) **Date of Inspection**

March 21, 2023, 8:30 a.m.

6) **Applicable Regulations**¹

Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code § 22-30-1 et seq., [Resource Conservation and Recovery Act (RCRA) Sections 3002 - 3005, (42 U.S. Code - Annotated U.S.C.A. 6925 and 6927)] and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code) [40 Code of Federal Regulation (C.F.R.) Parts 260-270, 273 and 279].

Alabama Hazardous Waste Management and Minimization Act (AHWMMA) Permit No. ALD981020894 for treatment and storage up to one year.

Pursuant to ADEM Admin. Code r. 335-14-1-.02(1)(a)151. [40 C.F.R. § 262.34(a) (2016)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a large quantity generator (LQG).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the Alabama Hazardous Wastes Management and Minimization Act (AHWMMA), Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

¹ Alabama’s Generator Improvements Rule (GIR) regulations were effective in Alabama as of April 6, 2018, but are not authorized by EPA, and therefore are not federally enforceable. For ease of reference and consistency with the corresponding ADEM Inspection Report, this report will cite the Alabama hazardous waste regulations in effect at the time of the inspection, and the corresponding federal regulations.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Clean Earth of Alabama, Inc.'s compliance with the conditions of its Alabama Department of Environmental Management (ADEM) Hazardous Waste Permit, Permit Number ALD981020894, the applicable requirements of RCRA, and the corresponding ADEM regulations. This was an EPA lead inspection.

8) **Facility Description**

Clean Earth of Alabama, Inc. (hereinafter, "CEA", or the "facility") is located at 402 Webster Chapel Road, Glencoe, Etowah County, Alabama. CEA is a wholly owned subsidiary of Clean Earth, Inc. The facility accepts a variety of hazardous and non-hazardous industrial wastes, pharmaceutical wastes, universal wastes, e-wastes and used oil. The majority of waste received at the facility is blended into fuel and shipped off-site to be burned in kilns, boilers, and industrial furnaces. Other wastes are accepted for storage and shipment off-site to permitted facilities. The facility receives wastes in bulk and containers by means of vans, tankers, roll offs, and dump trucks.

The property consists of 40 total acres, with approximately seven active acres within a fenced in area. The surrounding area consists of light industrial and residential housing within a 1,000-foot area around the facility. The facility is surrounded by a chain link fence with barbed wire. There are two gates that are used to control access to the facility. During normal working hours plant personnel and/or security personnel control access to the facility. The facility employs approximately 62 people (including clerical, sales, and drivers). The facility currently operates one primary work shift between 7 a.m. to 3:30 p.m. and a second work shift operates between 2:30 p.m. to 11:00 p.m. The site always has one security guard on the premises 24/7, 365 days a year.

The two water bodies located within 1,000 feet of the facility are Little Cove Creek and a quarry. The facility operates under an NPDES storm water discharge permit. A Best Management Plan, and Spill Prevention and Control Plan are maintained in accordance with this permit. All storm water that falls onto the facility is funneled to a storm water discharge point (DSN001) before being released. This discharge point is capable of holding approximately 10,000 gallons of storm water and is equipped with a valve that is capable of being opened and closed. This valve remains closed and is only opened to discharge storm water after the water to be discharged is inspected for obvious signs of oil sheen or other contamination. As part of the NPDES storm water permit, samples are collected semi-annually and sent off site to an independent lab for analysis. Storm water and ground water flows generally in a west/southwesterly direction. The City of Glencoe supplies the potable water and domestic waste is serviced on-site by a septic tank system.

The facility has four permitted container storage areas and one tank farm. These storage areas consist of the Building #1 (Main Warehouse) area at 21,550 square feet, Building #4 (Solids Building) area at 10,571 square feet, Building #3 (Bulk Building) area at 3,600 square feet, the

Building #2 (Pharmaceutical Waste Processing) area at 10,440 square feet, and the Tank Farm at 1,800 square feet. A laboratory, a maintenance building, and administrative offices support CEAs operations.

CEA is permitted as an Alabama Hazardous Waste Management and Minimization Act (AHWMMA) treatment and storage facility. The RCRA permit was issued to Environmental Waste Services of Alabama, Inc., (EWS) on September 26, 2014, and it expires on September 25, 2024. EWS received, stored, repackaged, recycled, and beneficially reclaimed, reused, and disposed of hazardous waste. EWS owned the facility from August 2006, until CEA acquired the facility from EWS in June 2016. EWS submitted a minor modification and Form 8700-12, to ADEM dated October 4, 2016, requesting a name change to CEA as the permittee. ADEM granted the modification on October 14, 2016. Prior to EWS, the facility was owned by C-MAC Environmental Group, Inc., and as Fisher Industrial Services. Fisher Industrial Services, the original facility owner received an interim status permit in 1986. On January 14, 2022, ADEM approved a minor modification, to the permit adding the shredding units located within Building #2.

CEA submitted a request for a major modification dated June 28, 2017, including a revised Part A and Part B application for closure of the Dispersion Vat and Tub Area, reutilization of the Main Warehouse QA/QC Area for storage of lab packs, extension and connection of a useable discharge line located in the main warehouse lab pack area to the Tank Farm manifold system, and to defer the proposed changes (2013 permit application) to the stabilization process and instead use as a receiving area. CEA's most recent Notification of Regulated Waste Activity (Form 8700-12), to ADEM was dated August 5, 2022, identifying the facility as a large quantity generator (LQG) of hazardous waste, a transporter of hazardous waste, a hazardous waste storage facility, and a large quantity handler of universal waste.

9) General Process Description

CEA receives hazardous waste in containers by vans, trucks, and roll-offs and in bulk by tankers. The facility is receiving hazardous waste liquids with less than 10 percent solids to accompany its fuels blending operation. No hazardous waste is received by rail or water at the facility. Hazardous waste received in containers are offloaded, weighed, and staged in the unloading dock area building. Bulk tankers are staged in the Tank Farm loading/unloading area. The paperwork is processed by staff in the receiving and administrative office using the Core of Operations System (CORE). The content of each container is reviewed to determine if it conforms with the manifest, shipping papers, and the CORE prequalified waste profiles/waste analysis electronic data previously processed by CEA administrative staff. The waste information is updated biennially. The administrative review is conducted in coordination with loading dock staff, who visually inspect the load, confirm the number of containers, weigh the containers, and place barcodes on the containers. During the unloading process if a container does not visually appear to be in satisfactory condition, the container is over packed. A container or a group of containers are staged for sampling and analysis. Samples are collected from each drum in this staging area and sent to the facility's on-site laboratory for analysis. Every drum is sampled, unless it is on the internal "do not touch" list, such as hydrofluoric acid. The facility also accepts wastes

consolidated from household hazardous waste collection centers. These drums are exempt from RCRA regulations but are still processed at the facility in the same way. Upon completion of the laboratory work, the containers are marked with a CEA orange label, given a profile code, and specifically marked to indicate the container's arrival date. The containers are transferred to the appropriate storage area.

10) Previous Inspection History

CEA was last inspected by the ADEM on June 22, 2022. The facility was cited for container management violations and poor floor coating of secondary containment areas in Receiving Area, Main Warehouse, and Building #3.

CEA was last inspected by the EPA, Region 4, for compliance with the RCRA regulations on February 27, 2018. The facility was cited deficiencies of container management, contingency plan, and exceeding maximum quantity of hazardous waste stored in the Stabilization Building.

11) Opening Conference

On March 21, 2023, EPA inspectors Parvez Mallick and Tarin Tischler accompanied by Alabama Department of Environmental Management (ADEM) inspectors Corey Holmes and Paul Searcy conducted an unannounced CEI at Clean Earth of Alabama, Inc., Glencoe, Alabama, to determine the compliance status of the facility with the RCRA and the State of Alabama regulations and the RCRA permit ALD981020894. This was an EPA-lead inspection. Inspectors arrived at the facility and were greeted by Bryan Jones, Environmental Health & Safety Director; Brad Phillips, General Manager; and Celia Mayben, Environmental Health & Safety Manager, of Clean Earth of Alabama, Inc. Inspectors were escorted to a conference room for an entrance briefing. The inspectors introduced themselves, showed their credentials, exchanged business cards, and explained the purpose of the visit.

CEA staff provided an overview of the facility's history and current operations during the opening conference. The inspectors described the possible use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The facility did not assert a business confidentiality claim. CEA does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Health and safety protocols and required personal protective equipment were discussed with the CEA staff, who led the inspectors on a tour of the facility's operations.

12) Inspection Observations

The information in this RCRA inspection report is based on the EPA's March 21, 2023, RCRA CEI. The inspection included the following areas:

Building #1 (Main Warehouse)

Building #1 is a large building that consists of several areas consisting of the Loading/Unloading Area, Container Staging Area, Pump-Up Area, Pour-Up Area, and Permitted Container Storage Area. Each area is equipped with spill control and personnel protective equipment (PPE). The facility also has two stock rooms equipped with spill control and PPE.

Receiving/Check-in/Unloading and Loading Area

Hazardous waste containers manifested to the facility are unloaded from the trucks and temporarily managed in this area of Building #1. Inspectors observed that unloaded containers of hazardous waste were ready for visual inspection, confirmation of number of containers, and waste documentation prior to storing in the Container Staging Area. Any containers not considered to be in a satisfactory condition are placed safely in an overpack drum or other suitable container.

Container Staging Area

Containers which have been unloaded and inspected from trucks are kept in this area of Building #1 until samples are collected and laboratory testing has been completed for confirmatory purposes. The facility representatives informed inspectors that drums are received in this area and processed within at least 72 hours, but typically this area unloaded 5-7 trailers a day and processes 3-4 times a day. Samples from containers of hazardous wastes were being obtained at the time of the inspection. The inspectors observed a satellite accumulation area (SAA) with one closed 55-gallon container of waste aerosol cans marked "Hazardous Waste" and with an indication of the hazards of the contents and one closed 55-gallon container accumulating spent sampling equipment and debris marked "Hazardous Waste" and a Department of Transportation (DOT) Class 9 miscellaneous dangerous goods label (Photo #1). The inspectors informed the facility representatives that use of a DOT Class 9 miscellaneous dangerous goods label does not meet the RCRA requirement in 40 C.F.R. Part 262 for a generator to mark or label its containers and tanks with an indication of the hazards of the contents. The DOT Class 9 miscellaneous dangerous goods label does not indicate any specific hazard associated with the waste. While this DOT Class 9 label does not meet the RCRA on-site accumulation labeling standard, it may be used when applicable to meet DOT requirements. Additional information can be found in EPA's website under Frequent Questions About Implementing the Hazardous Waste Generator Improvements Final Rule: <https://www.epa.gov/hwgenerators/frequent-questions-about-implementing-hazardous-waste-generator-improvements-final#marking>.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The eye wash located in Building #1 Sampling Area was covered with dirt and appeared had not been cleaned for a while (Photo #2). This is an area of concern. The eye wash must be operational and stay clean in case of an emergency.

Building #1 RCRA Permitted Container Storage Area (B#1 CSA)

This is a large open area constructed of concrete walls, a concrete floor, and a roof. The floor is sealed with an epoxy finish. The B#1 CSA is permitted to store containers of hazardous waste for a maximum of one year. Containers less than 30-gallons in capacity can be stacked more than two high. B#1 CSA is permitted to store a maximum of 55-gallon equivalent of 1,840 containers of hazardous waste with a total permitted capacity of 101,200-gallons.

Inspectors observed numerous containers ranging from approximately one-gallon to one-cubic yard. CEA stores the containers of hazardous waste in designated rows. The rows are identified with a sign attached to the wall, describing each row numerically and with word(s) either describing the type of hazardous waste, its destination facility, its waste status, or its waste disposition. The rows are described with the words: Flammable Corrosives; Oxidizers; Chemo Totes; Corrosives; Safety Kleen; Pour-Ups (small containers of fuel); Ross (incineration); Fuels (blending); Lab Packs (consolidation/incineration); WTI (incineration); Holds (waste discrepancy), Cape (sludge), and Lab Packs Rows A through D (processing/consolidation). The majority of the containers are 55-gallons in capacity and stacked two containers high on wooden pallets.

Unless mentioned below, hazardous waste containers observed in this building were closed, marked with the words “Hazardous Waste,” with an indication of the hazards of the contents, marked with a storage date less than one year, in good condition, and stored with sufficient aisle space. The inspectors observed following containers with deficiencies in the B#1 CSA:

- Approximately 85 containers were missing an indication of the hazards of the contents. Of these 85 containers, some were labeled with a DOT class 9 Miscellaneous dangerous goods label, and some containers were marked with only a DOT class 3 flammable liquid label despite exhibiting the hazardous characteristics of both ignitability and toxicity. However, the containers were closed, marked with the words “Hazardous Waste,” and marked with a storage date less than one year (Photos #3-6);
- One 5-gallon container of “Hazardous Waste” flammable resin solution (D001, F003) was in poor condition, dented/damaged (Photo #7);

- One 55-gallon container of “Hazardous Waste” flammable liquid waste (D001, F003) was, in poor condition, dented/damaged (Photo #8);
- A pallet of 24 5-gallon containers was wrapped in plastic, with one “Hazardous Waste” label, marked with one storage date less than one year, and with one indication of the hazards of the contents affixed on the plastic wrap. *The inspectors informed the facility that each container must be marked individually with the words “Hazardous Waste,” with an indication of the hazards of the contents and marked with a storage date less than one year. The inspectors observed at least four additional pallets marked with one “Hazardous Waste” marking, dated with one accumulation start date, and one indication of the hazards of the contents on the plastic wrap during the inspection.*
- Two pallets from Sherwin Williams, each containing 18 5-gallon containers, were wrapped in plastic film with one “Hazardous Waste” marked with a storage date less than one year, and one indication of the hazards of the contents was affixed on the plastic wrap.
- One 55-gallon and one 2-gallon container of “Hazardous Waste” container had no accumulation start date.
- One open 5-gallon container of “Hazardous Waste” with an indication of the hazards of the contents.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1) The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894, which incorporates ADEM Admin. Code r. 335-14-9-.05(1) [40 C.F.R. § 268.50(a)(2)(i)(C)], an owner/operator of a hazardous waste treatment, storage, or disposal facility that stores hazardous waste restricted from land disposal under subpart C of RCRA section 3004 in containers must clearly mark each container to identify its contents with an indication of the hazards of the contents.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section J. Condition of Containers: If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, upon discovery the Permittee shall immediately transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of ADEM Admin. Code r. 335-14-5-.09(2).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(ii) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the large quantity generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container).

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 2. A container holding hazardous waste must always be closed during storage, except when it is necessary to add, remove, sample, or inspect the waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(iv) [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste and must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

Pump-Up Area (Former Dispersion Vat and Tub Area)

CEA pumps hazardous waste destined for fuel burning from applicable containers to the tanks in the tank farm. They use the same hose to pump waste from drums into the tank and use a compatibility bucket in this area to test the compatibility of the waste streams before consolidating in the tanks. Not all drums are pumped into the tank farm after sampling, as some containers are brought to a truck for shipment to another waste processing location. CEA explained to inspectors that containers are pumped 100 percent empty. Empty containers are crushed on-site and shipped as scrap metal. Inspectors observed approximately 50 55-gallon containers in this area for pump-up. No deficiencies were noted in this area at the time of the inspection.

Pour-Up Area

The Pour-Up Area is located next to the Pump-Up Area. Hazardous waste is poured out of small containers and into 55-gallon containers. Small empty containers are then crushed and stored in 55-gallon containers. Small containers of hazardous waste that cannot be emptied are stored in 55-gallon containers. Inspectors observed a total of approximately 25 55-gallon and 250-gallon containers in this area from pour-up operations.

RCRA Permitted Tank Storage Area (Tank Storage Area)

The Tank Storage Area is a permitted hazardous waste tank farm located outdoors to the rear of Building #1 (Photo #11). The Tank Storage Area is constructed with a metal roof. Each of the six hazardous waste tanks have a capacity of approximately 15,000-gallons, 56.78 cubic meters, and a maximum organic vapor pressure of 76.6 kPa (11.11 psi). Hazardous waste received by CEA

and managed in the Tank Storage Area consists of waste paints, inks, coatings, and spent solvents. Hazardous waste is transferred from the facility's Pump-Up Area to the tanks and hazardous waste delivered in tankers is directly offloaded into the storage tanks. CEA blends spent solvents and other ignitable hazardous wastes to maximize Btu content and store the blended hazardous wastes in one of the Tank Storage Area's tanks. CEA manages hazardous waste containing greater than 500 parts per million by weight volatile organic compounds (VOCs) in six hazardous waste tanks. These tanks and ancillary equipment are regulated by 40 C.F.R. § 264, Subparts BB & CC which requires leak detection monitoring for fugitive emissions of VOCs. Inspectors observed the tanks constructed on a concrete pad, surrounded by concrete secondary containment, and labeled with the words "Hazardous Waste," with an indication of hazards of the contents, and dated with an accumulation start date.

The secondary containment for the six 15,000-gallon storage tanks is sufficient to capture a release of 100% of one of the tanks plus the accumulated rainfall of a 25 year/24-hour rainfall event. The containment system surrounding the tank and tank ancillary equipment appeared in good condition. All piping connections are welded, visible, and located in coated concrete trenches that drain into the storage tank containment area. Plant personnel indicate that all pumps and piping are inspected daily for visible leaks. At the time of the inspection, there were no leaks or evidence of leaks from the piping or pumps. The inspectors observed one area of the trench had cracks or other defects (Photo #12). The piping appeared free of corrosion and all welds appeared to be intact.

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894 and 40 C.F.R. Subpart BB requires that each tank system and associated ancillary equipment (flanges/pumps/end caps) used to manage hazardous waste be tagged for air leak monitoring. At the time of the inspection, the inspectors noticed that many of the tanks' ancillary equipments (flanges/connections/end caps) were not identified with a tag or tags were not clearly identifiable (Photos #13-20).

Tarin Tischler of EPA and Corey Holmes of ADEM climbed the exterior ladders of the tank farm to view the tops of the tanks. As required by Subpart CC, no visible cracks, holes, or gaps between each fixed roof's edge and tank walls were observed. All openings in the roof were secured in their closed positions. Each tank was fitted with an air pollution control device. The inspectors observed that tank #2 piping connections (Subpart BB) and process vents (Subpart CC) were not tagged or marked that it can be distinguished readily from other pieces of equipment (Photo #21). In addition, tank #2 had stains and corrosion on the top and appeared to have overflowed at some point (Photo #22).

Pursuant to Permit Condition specified in Part IV. Management in Tanks, Section H. Inspections: 1) The Permittee shall inspect each tank system (to include the ancillary equipment and secondary containment) and the area surrounding each tank as specified in Section 7 of the permit application and in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.10(6).

Pursuant to ADEM Admin. Code r. 335-14-6-.28 [40 C.F.R. § 264.1050(d)], requires each piece of equipment to which this subpart applies shall be marked in such a manner that it

can be distinguished readily from other pieces of equipment.

Building #4 (Solids Building)

The Solids Building is a large (10,571 square feet) building that is conducting hazardous waste management operations consisting of a RCRA permitted storage area. The building is constructed of concrete walls, a concrete floor, and constructed with a roof. The floor is sealed with an epoxy finish.

Building #4 RCRA Permitted Container Storage Area (B#4 CSA)

B#4 CSA is permitted to store containers of hazardous waste for a maximum of one year. Containers less than 30-gallons in capacity can be stacked more than two high. Building #4 is permitted to store a maximum of 55-gallon equivalent of 420 containers of hazardous waste with a total permitted capacity of 23,100-gallons.

CEA stores the containers of hazardous waste in designated rows. The rows are identified with a sign attached to the wall, describing each row as SB-1 through SB-8 (Photo #23). The majority of containers were 55-gallon in capacity, stored on wooden pallets, and stacked two containers high on wooden pallets. There were 20 55-gallon containers of flammable gas aerosols cans (D001, D007, and D035) and with indication of the hazards of the contents.

Three cubic yard containers of airbag inflators (D008) marked "Hazardous Waste," but had no indication of the hazards of the contents. The inspectors observed multiple 55-gallon and totes were marked with DOT Class 9 miscellaneous dangerous goods label (Photo #24). The inspectors informed the facility representatives that use of a DOT Class 9 miscellaneous dangerous goods label does not meet the RCRA requirement in 40 C.F.R. Part 262 for a generator to mark or label its containers and tanks with an indication of the hazards of the contents.

All the hazardous waste containers' start accumulation date were under one year of maximum storage time limit.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1. The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894, which incorporates ADEM Admin. Code r. 335-14-9-.05(1) [40 C.F.R. § 268.50(a)(2)(i)(C)], an owner/operator of a hazardous waste treatment, storage, or disposal facility that stores hazardous waste restricted from land disposal under subpart C of RCRA section 3004 in containers must clearly mark each container to identify its contents with an indication of the hazards of the contents.

Building #3 (Bulk Building)

The Bulk Building is a 3,600 square foot building that is conducting hazardous waste management operations consisting of a RCRA permitted container storage area and storage of hazardous waste in 50 cubic yard mobile roll-off containers. The building is constructed of concrete walls, a concrete floor, and constructed with a roof. The floor is sealed with an epoxy finish.

Building #3 RCRA Permitted Container Storage Area (B#3 CSA)

The B#3 CSA is permitted to store containers of hazardous waste aerosols and hazardous waste liquids for a maximum of one year. Containers less than 30-gallons in capacity can be stacked more than two high. Building #3 is permitted to store a maximum of 55-gallon equivalent of 960 containers of hazardous waste with a total permitted capacity of 52,800-gallons.

Inspectors observed numerous containers ranging from approximately five-gallon to approximately 275-gallons in capacity. Most of the containers were 55-gallons in capacity, stored on wooden pallets, and stacked two containers high. The inspectors observed approximately 12 containers were marked with DOT Class 9 miscellaneous dangerous goods label. In addition, there were 79 totes that were labeled as containing toluene and warfarin but were not marked with the applicable F and P waste codes and some were missing at least one indication of the hazards of the contents (Photos #25-27).

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1) The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Regarding the twelve containers and seventy-nine totes missing an indication of the hazards of the contents, pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894, which incorporates ADEM Admin. Code r. 335-14-9-.05(1) [40 C.F.R. § 268.50(a)(2)(i)(C)], an owner/operator

of a hazardous waste treatment, storage, or disposal facility that stores hazardous waste restricted from land disposal under subpart C of RCRA section 3004 in containers must clearly mark each container to identify its contents with an indication of the hazards of the contents.

Regarding the seventy-nine totes lacking appropriate EPA hazardous waste numbers, pursuant to Permit Condition specified in Part III. General Facility Conditions, Section A. General Waste Analysis: 1) The Permittee shall comply with all requirements set forth under ADEM Admin. Code R. 335-14-5-.02(4) and shall follow the procedures in the waste analysis plan described in Section 2 of the permit application.

Mobile Truck Containers

CEA stores waste pharmaceutical solids generated from the shredding operation in 50-cubic yard mobile truck containers. Inspectors observed two 50-cubic yard mobile truck containers of hazardous waste in this area. The mobile truck containers were closed, labeled with the words "Hazardous Waste," marked with start accumulation date of March 16, 2023 and March 17, 2023, in good condition, and stored with sufficient aisle space (Photos #28-30). The inspectors observed that the mobile truck containers were marked with DOT Class 9 miscellaneous dangerous goods label (Photos #28-30). The inspectors informed the facility representatives that use of a DOT Class 9 miscellaneous dangerous goods label does not meet the RCRA requirement in 40 C.F.R. Part 262 for a generator to mark or label its containers and tanks with an indication of the hazards of the contents.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1. The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894, which incorporates ADEM Admin. Code r. 335-14-9-.05(1) [40 C.F.R. § 268.50(a)(2)(i)(C)], an owner/operator of a hazardous waste treatment, storage, or disposal facility that stores hazardous waste restricted from land disposal under subpart C of RCRA section 3004 in containers must clearly mark each container to identify its contents with an indication of the hazards of the contents.

Building #2 (Waste Pharmaceuticals Shredding)

Building #2 is a large building that is conducting hazardous waste management operations consisting of a pharmaceutical waste processing, shredding, and a RCRA permitted storage area.

The building is constructed of concrete walls, a concrete floor, and constructed with a roof. The floor is sealed with an epoxy finish. Building #2 is permitted to store a maximum of 55-gallon equivalent of 1,780 containers of hazardous waste with a total permitted capacity of 97,900-gallons.

A Class I MOD of the permit was approved on May 31, 2019, to relocate the waste pharmaceuticals shredder from the Solids Processing Building and relocate it into Building #2, currently known as Waste Pharmaceuticals Shredding. In addition, ADEM approved a Class II MOD to add an additional shredder in Building #2. During the inspection, two shredder units were stationed side by side. The two shredders are permitted to treatment capacity of 14,000 pounds per hour.

Waste Pharmaceutical Processing Area

CEA receives containers of expired medicines or pharmaceutical waste as either non-hazardous or as RCRA hazardous waste such as D, F, P, and U listed wastes (Photos #31-32). The containers are rigid in design, UN rated, and approved by DOT for such type of pharmaceutical waste. Waste pharmaceuticals are received in various sizes of plastic containers on a loading dock area and staff process the content of each container to determine if it conforms with the manifest, shipping papers and the CORE documentation processed by CEA receiving staff. Waste pharmaceuticals are processed in this area by removing the content of each container into an approximate one-cubic yard hopper. Material can be fed to the shredder via a conveyor belt, or manually in which employees remove the lids from the containers and dump the contents into a hopper container (Photos #33-34). Usually, the hopper container is lifted, and its contents are dumped into a large infeed hopper constructed on top of a shredder. The contents of the hopper container are dumped into a shredder. The infeed hopper is surrounded by a metal catch pan to contain liquid spills. The shredded material drops down into a collection hopper container or through a dewatering screw into a roll-off container and liquid waste stream is pumped to a 250-gallon tote located next to the shredder. Once the roll-off container is full, it is moved to the Building #3 Mobile Truck Containers area until delivery to a permitted facility for final treatment/disposal. The shredded solid debris are sent to a RCRA incinerator or to a cement kiln as fuel. If the resulting liquids are amenable to fuel blending the totes are transferred directly into a tanker for outbound disposal, otherwise totes are stored within the containment of B#3 CSA until shipped off site for RCRA incineration.

The pharmaceutical waste shredder machines were not operating at the time of the inspection. The inspectors observed shredded/non-shredded pharmaceutical hazardous waste debris (IV bags, medicine containers, syringes, medicine) were strewn under the secondary containment of the shredder units and outside the containment on the floor (Photos #35-37). In addition, pharmaceutical hazardous waste liquid wastes were overflowing the secondary containment, multiple containers appeared to be leaking, and spilled hazardous waste liquids were observed in other areas of the Building #2 (Photos #38-41). The inspectors were not able to inspect the entire floor of Building #2 because of the amount of liquid waste pooled on the floor. The coating for the floor of the secondary containment system in this area was cracked.

The inspectors observed a closed tote storing pharmaceutical hazardous waste liquid marked with the words “Hazardous Waste,” a Department of Transportation (DOT) Class 9 miscellaneous dangerous goods label, and marked with the date March 17, 2023, was leaking on the floor (Photo #42). A review of the daily inspections for this area indicated that liquid waste overflowing the secondary containment system from the shredder unit is a daily occurrence noted on the daily inspection records. The inspectors informed the facility representative that the secondary containment system for the shredder does not appear to be adequate for solid and liquid wastes spilled from the shredder units.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1) The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part II. General Facility Conditions, Section II.D. Contingency Plan: the Permittee shall immediately carry out the provisions of the Contingency Plan described in Section 3 of the permit application and follow the emergency procedures as required by ADEM Admin. Code R. 335-14- 5-.04(2) whenever there is a fire, explosion, or release of hazardous waste or hazardous constituents.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section III.E. Containment: 1) the Permittee shall maintain the containment systems of the container storage and treatment areas in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.09(6)(b), and as specified in Section 10 of the permit application. 2) the Permittee shall maintain an impervious coating which is free of cracks, gaps, or other deterioration on all containment system surfaces which may be exposed to hazardous wastes or hazardous constituents (or releases of hazardous wastes or hazardous constituents).

Pursuant to Permit Condition specified in Part III. Management in Containers, Section F. Inspections: the Permittee shall inspect areas where containers are stored or handled to detect leaking containers and deterioration of containers or containment systems and to ensure stacking is no more than two high as specified in Section 7 of the permit application and as required by ADEM Admin. Code R. 335-14-5-.09(5).

Pursuant to Permit Condition Part III. Management in Containers, Section J. Condition of Containers: if a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, upon discovery the Permittee shall immediately transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of ADEM Admin. Code R. 335-14-5-.09(2).

Pursuant to ADEM Admin. Code r. 335-14-5-.03(2) [40 C.F.R. § 264.31], a hazardous waste treatment, storage, or disposal facility must be designed, constructed, 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,

groundwater, or surface water which could threaten human health or the environment.

Building #2 RCRA Permitted Container Storage Area (B#2 CSA)

Inspectors observed numerous containers ranging from approximately five-gallons to approximately one-cubic yard in capacity. The majority were 55-gallons in capacity, storing pharmaceutical and chemotherapy hazardous waste and debris (epinephrine, warfarin, napropamide, trichlorosilane, ethanol - EPA Waste Codes D, P and U) including flammable, corrosives, and toxic wastes. The containers were stored on wooden pallets stacked two containers high. Inspectors observed the containers were stored in approximately 10 rows, two containers wide and two containers high. Approximately 50 55-gallon containers and cubic yard boxes of P001 and P075 pharmaceutical hazardous waste were not marked with a “Toxic” indication of the hazards of the contents (Photos #43-44). In addition, there were 55-gallon containers of waste medicine containing toluene and warfarin marked with EPA waste codes D001, D004-D010, but were not marked with the applicable F and P waste code (Photos #45-47).

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1) The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 (Condition of Containers) of the permit application.

Pursuant to Permit Condition Part III. Management in Containers, Section C. Storage in Containers: 1) The Permittee shall maintain and operate the container storage areas in accordance with the procedures specified in Section 5 (Condition of Containers) of the permit application.

Regarding the eighty-five containers and totes missing an indication of the hazards of the contents, pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to Permit Condition specified in Part III. Management in Containers, Section E. Containment: 1) the Permittee shall maintain the containment systems of the container storage and treatment areas in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.09(6)(b), and as specified in Section 10 of the permit application. 2) the Permittee shall maintain an impervious coating which is free of cracks, gaps, or other deterioration on all containment system surfaces which may be exposed to hazardous wastes or hazardous constituents (or releases of hazardous wastes or hazardous constituents).

Pursuant to Permit Condition specified in Part III. Management in Containers, Section F. Inspections: The Permittee shall inspect areas where containers are stored or handled to detect leaking containers and deterioration of containers or containment systems and to ensure stacking is no more than two high as specified in Section 7 of the permit application and as required by ADEM Admin. Code R. 335-14-5-.09(5).

Laboratory

The Laboratory is used for analyzing various parameters (e.g., pH, flash point, PCB, density, etc.) of sampled waste streams that are stored at the facility. The inspectors observed a total of 12 containers in SAAs ranging from one pint to five gallons in size at different locations of the Laboratory. The containers were closed, marked with the words “Hazardous Waste”, and with an identification of hazards. According to facility representative, at the end of each day, all satellite accumulation containers in the Laboratory are emptied into a larger container located in the storage room for the Laboratory. The inspectors observed two 30-gallon containers (Photos #48-49). One of the 30-gallon containers was designated for hazardous waste solids and the other 30-gallon container was designated for hazardous waste liquids. Both containers were closed, marked with the words “Hazardous Waste,” and marked with an identification of hazards (DOT Class 9 miscellaneous dangerous goods label). All of the other containers inside the Laboratory were closed, labeled with the words “Hazardous Waste”, and marked with an identification of hazards.

The inspectors informed the facility that the 30-gallon containers in the storage area must be dated, the date upon which each period of accumulation begins. In addition, the inspectors stated that use of a DOT Class 9 miscellaneous dangerous goods label does not meet the RCRA requirement in 40 C.F.R. Part 262 for a generator to mark or label its containers and tanks with an indication of the hazards of the contents. The DOT Class 9 miscellaneous dangerous goods label does not indicate any specific hazard associated with the waste.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to ADEM Admin. Code r. 335-14-9 [40 C.F.R. § 268.50(a)(2)(i)], Prohibitions on Storage of Restricted Waste. Except as provided in this section, the storage of hazardous wastes restricted from land disposal under subpart C of this part of RCRA section 3004 is prohibited, unless the following conditions are met: each container is clearly marked to identify its contents and the date each period of accumulation begins.

13) **Records Review**

After the walkthrough, the inspectors requested and reviewed the facility's applicable manifests, waste profiles, Land Disposal Restriction (LDR) notification forms, weekly inspections, contingency plan, LDAR records, training records, arrangement with the local authorities, biennial report, and employee training records. Unless otherwise specified, all records and documents reviewed were considered satisfactory at the time of inspection.

The contingency plan (CP) was most recently revised in 2022; however, since that time, one of the designated emergency coordinators was replaced with Celia Mayben. Whenever the list of emergency coordinators changes, an LQG/Storage facility must review and immediately amend the CP. In addition, the facility did not revise its' quick reference guide (QRG) and could not demonstrate that the appropriate arrangement with the local police, fire department, hospital, and local emergency response agencies have been made and a copy of QRG along with an amended CP were submitted to the local emergency planning committee.

Pursuant to ADEM Admin. Code r. 335-14-5-.04(5) [40 C.F.R. § 264.54], a hazardous waste treatment, storage, or disposal facility's contingency plan must be reviewed, and immediately amended, if necessary, whenever: (d) The list of emergency coordinators changes.

Pursuant to ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 CFR 262.262(b)], a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: (1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); (2) The estimated maximum amount of each hazardous waste that may be present at any one time; (3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) The locations of water supply (e.g., fire hydrant and its flow rate); (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and (8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Pursuant to ADEM Admin. Code r. 335-14-5-.04(4) [40 C.F.R. § 264.53(d)], a hazardous waste treatment, storage, or disposal facility's contingency plan and all revisions to the plan must be: (a) Maintained at the facility; and (b) Submitted to all local police

departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Quarterly air monitoring records for the hazardous waste tanks along with associated ancillary equipment were available for review. During the records review, the inspectors noted that the facility was only recording the highest reading for piping joints while the ancillary equipment have multiple joints and sampling points for leak detection. The facility was not able to provide leak detection and repair (LDAR) records for ancillary equipment's multiple joint's sampling records, as required pursuant to the CEA's permit and 40 C.F.R. § 264, Subparts BB & CC requirements.

Pursuant to Permit Condition specified in Part IV. Management in Tanks, Section H. Inspections: 1) The Permittee shall inspect each tank system (to include the ancillary equipment and secondary containment) and the area surrounding each tank as specified in Section 7 of the permit application and in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.10(6); and 2) The Permittee must document in the operating record of the facility the results of inspection required by Condition IV.H.1.

Pursuant to Permit Condition specified in Part II. General Facility Condition, Section C. Recordkeeping and Recording: The Permittee shall comply with the requirements of ADEM Admin. Code R. 335-14-5-.05(4), (5) and (6).

Spill kits, eye wash and shower stations, fire alarms, and fire extinguishers are available on-site. The facility conducts routine inspections, testing, and maintenance of all communications systems, fire protection equipment, spill control equipment, and decontamination equipment. The facility utilizes a two-way radio system for internal communications.

Biennial reports for 2021 were available on-site. The biennial report was submitted on time and had been reviewed by ADEM.

14) Closing Conference

Upon conclusion of the inspection, a closing conference was conducted in the presence of CEA staff. The facility was informed of the preliminary findings at the time of the inspection.

15) Summary of Observations

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

At the time of the CEI, the inspectors observed a container in the container staging area that was labeled with a DOT Class 9 Miscellaneous dangerous goods label and did not include an applicable hazard associated with the waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

At the time of the CEI, the inspectors observed a container in the container staging area that was labeled with a DOT Class 9 Miscellaneous dangerous goods label and did not include an applicable indication of hazards of the contents of the container.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1) The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

At the time of the CEI, inspectors observed one pallet holding 24 containers and two pallets each holding 18 containers each that were wrapped in plastic wrap displaying a single label. The containers on the pallets were not individually labeled with the date the container was received and all appropriate EPA hazardous waste numbers associated with the contents.

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894, which incorporates ADEM Admin. Code r. 335-14-9-.05(1) [40 C.F.R. § 268.50(a)(2)(i)(C)], an owner/operator of a hazardous waste treatment, storage, or disposal facility that stores hazardous waste restricted from land disposal under subpart C of RCRA section 3004 in containers must clearly mark each container to identify its contents with an indication of the hazards of the contents.

At the time of the CEI, inspectors observed 85 containers in Building #1 RCRA Permitted storage area that were not marked with a proper indication of hazards. Inspectors also observed

60 containers on three pallets that were wrapped in plastic wrap displaying a single label. The containers on the pallets were not individually labeled with the date the container was received and all appropriate EPA hazardous waste numbers associated with the contents.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section J. Condition of Containers: If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, upon discovery the Permittee shall immediately transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of ADEM Admin. Code r. 335-14-5-.09(2).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(ii) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the large quantity generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section.

At the time of the CEI, inspectors observed two containers in poor condition that had not been immediately transferred to a container in good condition in Building #1 RCRA Permitted container storage area.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container).

At the time of the CEI, inspectors observed one container in Building #1 RCRA Permitted container storage area that was not marked with the date the container was received.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 2. A container holding hazardous waste must always be closed during storage, except when it is necessary to add, remove, sample, or inspect the waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(iv) [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste and must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

At the time of the CEI, inspectors observed one container that was open in Building #1 RCRA Permitted container storage area.

Pursuant to Permit Condition specified in Part IV. Management in Tanks, Section H. Inspections: 1) The Permittee shall inspect each tank system (to include the ancillary

equipment and secondary containment) and the area surrounding each tank as specified in Section 7 of the permit application and in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.10(6).

At the time of the CEI, inspectors observed corrosion and stains on the top of tank #2 in the RCRA permitted tank storage area.

Pursuant to ADEM Admin. Code r. 335-14-6-.28 [40 C.F.R. § 264.1050(d)], requires each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.

At the time of the CEI, inspectors observed that the piping connections and process vents on tank #2 in the RCRA permitted tank storage area were not tagged or marked so that it can be distinguished readily from other pieces of equipment.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1. The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

At the time of the CEI, inspectors observed three cubic yard boxes of airbag inflators (D008) and multiple containers with DOT Class 9 miscellaneous dangerous goods labels that were not marked with an indication of the types of hazardous waste in the containers in Building #4 RCRA Permitted Container Storage Area.

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894, which incorporates ADEM Admin. Code r. 335-14-9-.05(1) [40 C.F.R. § 268.50(a)(2)(i)(C)], an owner/operator of a hazardous waste treatment, storage, or disposal facility that stores hazardous waste restricted from land disposal under subpart C of RCRA section 3004 in containers must clearly mark each container to identify its contents with an indication of the hazards of the contents.

At the time of the CEI, inspectors observed three cubic yard boxes of airbag inflators (D008) and multiple containers with DOT Class 9 miscellaneous dangerous goods labels that were not marked with an indication of the types of hazardous waste in the containers in Building #4 RCRA Permitted Container Storage.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1) The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

At the time of the CEI, inspectors observed 79 totes that were labeled as containing toluene and warfarin but were not marked with the applicable F and P waste codes in Building #3 RCRA Permitted Container Storage area.

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894, which incorporates ADEM Admin. Code r. 335-14-9-.05(1) [40 C.F.R. § 268.50(a)(2)(i)(C)], an owner/operator of a hazardous waste treatment, storage, or disposal facility that stores hazardous waste restricted from land disposal under subpart C of RCRA section 3004 in containers must clearly mark each container to identify its contents with an indication of the hazards of the contents.

At the time of the CEI, inspectors observed 79 totes that were labeled as containing toluene and warfarin but were not marked with the applicable F and P waste codes, as well as 12 containers that were marked with a DOT miscellaneous dangerous goods label and were missing a proper indication of hazards in Building #3 RCRA Permitted Container Storage area.

Pursuant to Permit Condition specified in Part III. General Facility Conditions, Section A. General Waste Analysis: 1) The Permittee shall comply with all requirements set forth under ADEM Admin. Code R. 335-14-5-.02(4) and shall follow the procedures in the waste analysis plan described in Section 2 of the permit application.

At the time of the CEI, inspectors observed 79 totes that were labeled as containing toluene and warfarin but were not marked with the applicable F and P waste codes in Building #3 RCRA Permitted Container Storage area.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1. The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging

period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to RCRA Hazardous Waste Facility Permit ALD981020894, which incorporates ADEM Admin. Code r. 335-14-9-.05(1) [40 C.F.R. § 268.50(a)(2)(i)(C)], an owner/operator of a hazardous waste treatment, storage, or disposal facility that stores hazardous waste restricted from land disposal under subpart C of RCRA section 3004 in containers must clearly mark each container to identify its contents with an indication of the hazards of the contents.

At the time of the CEI, inspectors observed two 50-cubic yard mobile truck containers marked with DOT Class 9 miscellaneous dangerous goods label and were missing a proper indication of the hazards of its contents.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1) The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 of the permit application.

Pursuant to Permit Condition specified in Part II. General Facility Conditions, Section II.D. Contingency Plan: the Permittee shall immediately carry out the provisions of the Contingency Plan described in Section 3 of the permit application and follow the emergency procedures as required by ADEM Admin. Code R. 335-14- 5-.04(2) whenever there is a fire, explosion, or release of hazardous waste or hazardous constituents.

At the time of the CEI, inspectors observed shredded/non-shredded pharmaceutical hazardous waste debris (IV bags, medicine containers, syringes, medicine) strewn under the secondary containment of the shredder units and outside the containment on the floor, as well as pharmaceutical hazardous waste liquid wastes in puddles within the secondary containment surrounding the pharmaceutical waste shredder in the waste pharmaceutical processing area.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section III.E. Containment: 1) the Permittee shall maintain the containment systems of the container storage and treatment areas in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.09(6)(b), and as specified in Section 10 of the permit application. 2) the Permittee shall maintain an impervious coating which is free of cracks, gaps, or other deterioration on all containment system surfaces which may be exposed to hazardous wastes or hazardous constituents (or releases of hazardous wastes or hazardous constituents).

At the time of the CEI, inspectors observed cracks in the coating for the floor of the secondary containment system in the waste pharmaceutical processing area.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section F. Inspections: the Permittee shall inspect areas where containers are stored or handled to detect leaking containers and deterioration of containers or containment systems and to ensure stacking is no more than two high as specified in Section 7 of the permit application and as required by ADEM Admin. Code R. 335-14-5-.09(5).

Pursuant to Permit Condition Part III. Management in Containers, Section J. Condition of Containers: if a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, upon discovery the Permittee shall immediately transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of ADEM Admin. Code R. 335-14-5-.09(2).

At the time of the CEI, inspectors observed multiple containers that appeared to be leaking in the waste pharmaceutical processing area in Building #2.

Pursuant to ADEM Admin. Code r. 335-14-5-.03(2) [40 C.F.R. § 264.31], a hazardous waste treatment, storage, or disposal facility must be designed, constructed, 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, groundwater, or surface water which could threaten human health or the environment.

At the time of the CEI, inspectors observed shredded/non-shredded pharmaceutical hazardous waste debris (IV bags, medicine containers, syringes, medicine) strewn under the secondary containment of the shredder units and outside the containment on the floor, as well as pharmaceutical hazardous waste liquid wastes in puddles within the secondary containment surrounding the pharmaceutical waste shredder in the waste pharmaceutical processing area in Building #2.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 1) The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section 5 (Condition of Containers) of the permit application.

Pursuant to Permit Condition Part III. Management in Containers, Section C. Storage in Containers: 1) The Permittee shall maintain and operate the container storage areas in accordance with the procedures specified in Section 5 (Condition of Containers) of the permit application.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-

.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

At the time of the CEI, inspectors observed numerous containers in Building #2 RCRA permitted storage area storing waste medicine containing toluene and warfarin that were marked with EPA waste codes D001, D004-D010, but were not marked with the applicable F and P waste codes.

Pursuant to Permit Condition specified in Part II. General Facility Conditions, Section II.D. Contingency Plan: the Permittee shall immediately carry out the provisions of the Contingency Plan described in Section 3 of the permit application and follow the emergency procedures as required by ADEM Admin. Code R. 335-14- 5-.04(2) whenever there is a fire, explosion, or release of hazardous waste or hazardous constituents.

At the time of the CEI, inspectors observed pools of liquid hazardous waste on the floor of the waste pharmaceutical processing area in Building #2.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section E. Containment: 1) the Permittee shall maintain the containment systems of the container storage and treatment areas in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.09(6)(b), and as specified in Section 10 of the permit application. 2) the Permittee shall maintain an impervious coating which is free of cracks, gaps, or other deterioration on all containment system surfaces which may be exposed to hazardous wastes or hazardous constituents (or releases of hazardous wastes or hazardous constituents).

At the time of the CEI, inspectors observed cracks in the coating for the floor of the secondary containment system in the waste pharmaceutical processing area.

Pursuant to Permit Condition specified in Part III. Management in Containers, Section F. Inspections: The Permittee shall inspect areas where containers are stored or handled to detect leaking containers and deterioration of containers or containment systems and to ensure stacking is no more than two high as specified in Section 7 of the permit application and as required by ADEM Admin. Code R. 335-14-5-.09(5).

Pursuant to Permit Condition specified in Part III. Management in Containers, Section L. Management of Containers: 6) An appropriate hazardous waste label will be affixed to each container. The label will include, at a minimum, the date the container was received (or other information that provides a clear indication of the beginning date of the staging period for the container) and all appropriate EPA hazardous waste numbers associated with the hazardous waste in the container as specified in ADEM Admin. Code r. 335-14-2-.03 and 335-14-2-.04 (or other information that provides a clear indication of the type(s) of hazardous waste in the container and the hazard(s) associated with that waste).

Pursuant to ADEM Admin. Code r. 335-14-9 [40 C.F.R. § 268.50(a)(2)(i)], Prohibitions on Storage of Restricted Waste. Except as provided in this section, the storage of hazardous

wastes restricted from land disposal under subpart C of this part of RCRA section 3004 is prohibited, unless the following conditions are met: each container is clearly marked to identify its contents and the date each period of accumulation begins.

At the time of the CEI, inspectors observed two 30-gallon containers in the laboratory that were not marked with the beginning date of the staging period for the container or an indication of the hazards of the containers' contents.

Pursuant to ADEM Admin. Code r. 335-14-5-.04(5) [40 C.F.R. § 264.54], a hazardous waste treatment, storage, or disposal facility's contingency plan must be reviewed, and immediately amended, if necessary, whenever: (d) The list of emergency coordinators changes.

At the time of the CEI, inspectors observed that the contingency plan had not been amended to reflect the facility's change in emergency coordinator.

Pursuant to ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 CFR 262.262(b)], a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: (1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); (2) The estimated maximum amount of each hazardous waste that may be present at any one time; (3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) The locations of water supply (e.g., fire hydrant and its flow rate); (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and (8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

At the time of the CEI, the facility had not revised its quick reference guide to the contingency plan to reflect the facility's change in emergency coordinators.

Pursuant to ADEM Admin. Code r. 335-14-5-.04(4) [40 C.F.R. § 264.53(d)], a hazardous waste treatment, storage, or disposal facility's contingency plan and all revisions to the plan must be: (a) Maintained at the facility; and (b) Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

At the time of the CEI, the facility had not revised its quick reference guide and submitted the revised version to local authorities.

Pursuant to Permit Condition specified in Part IV. Management in Tanks, Section H. Inspections: 1) The Permittee shall inspect each tank system (to include the ancillary equipment and secondary containment) and the area surrounding each tank as specified in Section 7 of the permit application and in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.10(6); and 2) The Permittee must document in the operating record of the facility the results of inspection required by Condition IV.H.1.

At the time of the CEI, the facility was only recording the highest concentration for piping joints while the ancillary equipment have multiple joints and sampling points for leak detection.

Pursuant to Permit Condition specified in Part II. General Facility Condition, Section C. Recordkeeping and Recording: The Permittee shall comply with the requirements of ADEM Admin. Code R. 335-14-5-.05(4), (5) and (6).

At the time of the CEI, the facility was not able to provide leak detection and repair (LDAR) records for ancillary equipment's multiple joint's sampling records.

15) **Conclusion**

Based on the CEI conducted on March 21, 2023, Clean Earth of Alabama, Inc., was inspected as a RCRA permitted storage facility, a large quantity generator of hazardous waste, a transporter of hazardous waste, and a large quantity handler of universal waste.

16) **Signed**

Tarin Tischler
Life Scientist
RCRA Enforcement Section

Date

**PARVEZ
MALLICK**

Digitally signed by
PARVEZ MALLICK
Date: 2023.07.31
16:41:57 -04'00'

Parvez Mallick
Environmental Engineer
RCRA Enforcement Section

7/31/2023

Date

17) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.07.31 17:01:00 -04'00'

Araceli B. Chavez

Chief

RCRA Enforcement Section

Date

Clean Earth of Alabama, Inc.
RCRA CEI Photographs taken by Parvez Mallick, EPA Region 4
Camera: Canon PowerShot



Photo #1 – Two SAA containers in Building #1.



Photo #2 – Eye wash located in Building #1.



Photo #3 – Container missing an indication of the hazards.



Photo #4 – Containers missing an indication of the hazards.



Photo #5 - Container missing an indication of the hazards.



Photo # 6 – Containers missing an indication of the hazards.

Clean Earth of Alabama, Inc.
RCRA CEI Photographs taken by Parvez Mallick, EPA Region 4
Camera: Canon PowerShot



Photo #7 – A 5-gallon damaged container.



Photo #8 - A 55-gallon damaged container.



Photo #9 - 5-gallon containers were wrapped and secured with plastic.



Photo #10 – Two pallets of 5-gallon containers wrapped and secured with plastic.



Photo #11 – Hazardous waste tank farm.



Photo #12 – Cracked floor in the containment of ancillary equipment.

Clean Earth of Alabama, Inc.
RCRA CEI Photographs taken by Parvez Mallick, EPA Region 4
Camera: Canon PowerShot



Photo #13 – ancillary equipment connections are not identified with a tag.



Photo #14 – ancillary equipment connections are not identified with a tag.



Photo #15 – ancillary equipment connections are not identified with a tag.



Photo #16 – ancillary equipment connections are not identified with a tag.



Photo #17 – ancillary equipment connections are not identified with a tag.



Photo #18 – ancillary equipment connections are not identified with a tag.



Photo #19 – ancillary equipment connections are not identified with a tag.



Photo #20 – ancillary equipment connections are not identified with a tag.



Photo #21 – ancillary equipment connections are not identified with a tag.



Photo #22 – ancillary equipment connections are not identified with a tag.



Photo #23 – Building #4 - (Solids Processing Building).

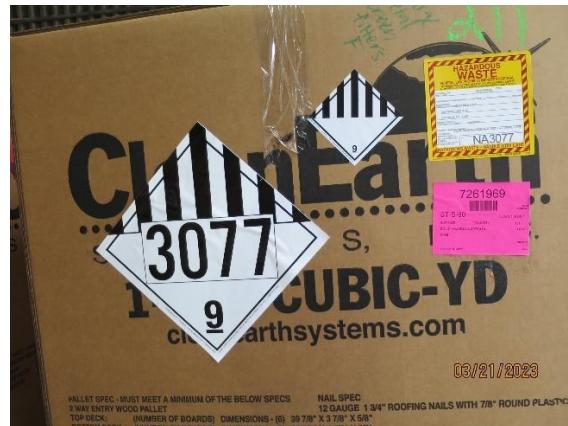


Photo #24 – Building #4 - missing an indication of the hazards.

Clean Earth of Alabama, Inc.
RCRA CEI Photographs taken by Parvez Mallick, EPA Region 4
Camera: Canon PowerShot



Photo #25 – Pharmaceutical waste totes missing applicable P waste code.



Photo #26 - Pharmaceutical waste tote missing applicable P waste codes.



Photo #27 – Pharmaceutical waste tote missing applicable P waste codes.



Photo #28 – Missing an indication of the hazards of the contents.



Photo #29 – Missing an indication of the hazards of the contents.



Photo #30 – Missing an indication of the hazards of the contents.

Clean Earth of Alabama, Inc.
RCRA CEI Photographs taken by Parvez Mallick, EPA Region 4
Camera: Canon PowerShot



Photos #31 – Building #2 – pharmaceutical wastes storage area.



Photo #32 – Building #2 – pharmaceutical wastes storage area.



Photo #33 – Pharmaceuticals waste shredding unit.



Photo #34 – Pharmaceuticals waste shredding unit.



Photo #35 – Spilled pharmaceutical wastes under the shredding unit.



Photo #36 – Spilled pharmaceutical wastes under the shredding unit.

Clean Earth of Alabama, Inc.
RCRA CEI Photographs taken by Parvez Mallick, EPA Region 4
Camera: Canon PowerShot



Photo #37 – Spilled pharmaceutical wastes under the shredding unit.



Photo #38 – Spilled pharmaceutical wastes under the shredding unit.



Photo #39 – Spilled liquid pharmaceutical waste near the shredding unit.



Photo #40 – Spilled liquid pharmaceutical waste Under the shredding unit.



Photo #41 – Pharmaceutical waste containers leaking in staging/storage area – Building #2.



Photo #42 – Spilled liquid pharmaceutical waste From the shredding unit and SAA container.

Clean Earth of Alabama, Inc.
RCRA CEI Photographs taken by Parvez Mallick, EPA Region 4
Camera: Canon PowerShot



Photo #43 – Pharmaceutical hazardous waste not marked with a “Toxic” indication of the hazards of the contents.



Photo #44 – Pharmaceutical hazardous waste not marked with a “Toxic” indication of the hazards of the contents.



Photo #45 – Pharmaceutical wastes not identified with an appropriate EPA hazardous waste code.



Photo #46 – Pharmaceutical wastes not identified with an appropriate EPA hazardous waste code.



Photo #47 – Pharmaceutical wastes not identified with an appropriate EPA hazardous waste code.



Photo #48 – 30-gallon waste container accumulating solid hazardous wastes in the lab storage room.

Clean Earth of Alabama, Inc.
RCRA CEI Photographs taken by Parvez Mallick, EPA Region 4
Camera: Canon PowerShot



Photo #49 – 30-gallon waste container accumulating liquid hazardous wastes in the lab storage room.