

RCRA Inspection Report

1) Inspector and Author of Report

William Kappler
Physical Scientist
RCRA Enforcement Section
Phone: (404) 562-8498
kappler.william@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Safety Kleen Systems, Inc., Lexington SCD077995488
130A Frontage Road
Lexington, Lexington County, South Carolina 29073

3) Responsible Official

John E. Hook
Facility General Manager

(803) 359-2459
eddie.hook@safety.kleen.com

4) Inspection Participants

John E. (Eddie) Hook, Safety Kleen Systems, Inc., Lexington
Todd Blake, Safety Kleen Systems, Inc., Lexington
Jim Childress, Safety Kleen Systems, Inc., Lexington
Steve Hopkins, Safety Kleen Systems, Inc., Lexington
Elizabeth DeLanghe, South Carolina Department of Health and Environmental Control
Gerald D. Shealy, South Carolina Department of Health and Environmental Control
William Kappler, U. S. Environmental Protection Agency, Region 4

5) Date of Inspection

February 2, 2023

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. §§ 6925 and 6927), South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 *et seq.*, and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279, [40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279]; and the Office of Environmental Quality Control Bureau of Land and Waste Management Hazardous Waste Permit Number SCD 077 955 488 (“the Permit”).

¹ As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of 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 44-56-60(a)(2) and (b) of the S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.124, 264-267, and 270, and S.C. Code Ann. Regs. 61-79.262.16(b) or R.61-79.262.17(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15 (a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Sections 44-56-60(a)(2) and (b) of the S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.124, 264-267, and 270, provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], (hereinafter referred to as the “LQG Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was for the U.S. Environmental Protection Agency, Region 4, and the South Carolina Department of Health and Environmental Control to conduct a joint unannounced compliance evaluation inspection (CEI) at Safety Kleen Systems, Inc., Lexington (hereinafter, “SK” or the “facility”) to determine compliance with the applicable requirements of the Resource Conservation and Recovery Act (RCRA) and the corresponding South Carolina Department of Health and Environmental Control (SCDHEC) regulations. This was an EPA lead inspection.

8) Facility Description

SK is one of several facilities owned and operated nationwide by Clean Harbors Incorporated. SK is located at 130A Frontage Road, Lexington, Lexington County, South Carolina, Latitude 33.972442, and Longitude -81.199222. The facility has been at its present location since about 1974 and consists of approximately 38 acres. The facility employs approximately 18 people and operates 24 hours a day, seven days a week. The facility consists of the Branch Receiving Center, Maintenance Shop, Old Maintenance Shop, Distribution Warehouse, Quality Control Laboratory, RCRA Permitted Container Storage Areas, Tanker Tunnel and RCRA Permitted Tank Farms. SK is a RCRA permitted treatment, storage and disposal (TSD) facility operating under the NAICS Codes 562112 for Hazardous Waste Collection and 56292 for Materials Recovery Facilities.

Safety Kleen submitted a RCRA Subtitle C Site Identification Form, 8700-12, of its regulated waste activity to SCDHEC, dated February 25, 2022, notifying as a LQG of hazardous waste, a large quantity handler of universal waste (SQHUW), a transporter, a transfer facility, a used oil

transporter, a used oil marketer and a permitted storage/recycling facility. At the time of the inspection, the facility's permit had expired, and SK had applied for a new permit that is currently under review by the SCDHEC.

SK manages hazardous and non-hazardous waste streams that include solvents and solvent-containing waste, oils and oil-bearing materials, industrial and automotive coolants, and other wastes which are amenable to recycling by reclamation, blending into useable fuels, or can be safely managed and stored at the facility before being shipped to another waste facility. Wastes received at the facility may be stored in containers in the permitted container storage areas, stored in tanks in the permitted tank storage areas, and/or processed in one of the on-site solvent recovery units. The subject facility specializes in the receipt, storage, recovery and recycling of spent solvents used in SK's parts washer units.

Operations at this facility are separated into two distinct areas, the Service Center and the Recycling Center, which are managed by two separate business units. The Service Center manages incoming spent parts washer solvent and outgoing containers of recycled solvent under the company's Parts Washer Service program. The Service Center also receives and manages used oil under the SK Oil Services (SKOS) program, although this material is not processed at this location. The Recycle Center receives hazardous waste from the Service Center for processing and returns recycled solvent back to the Service Center for distribution back to the customer. The Recycle Center also receives wastes for drum-in-drum-out (DIDO) hazardous waste storage, and for 10-day management as a hazardous waste transfer facility. According to the Permit, the Recycle Center may also recycle waste for other "closed-loop" programs, from certain "industry specific" sources, and from individual "industrial" sources.

Closed Loop Services: Under the SK denoted "closed loop" service, SK representatives retrieve spent solvent fluid from the customer's facility and replace it with clean solvent. The dirty, or spent fluid is brought to a SK Service Center where it is prepared for bulk reclamation at one of SK's Recycle Centers. Reclaimed (clean) solvent is then delivered back to a Service Center for subsequent distribution to customers. Waste streams generated through SK's "closed loop" service include parts washer fluid, immersion cleaner, and paint gun cleaner. According to SK, historically the solvents in each of these "closed-loop" services have been of a consistent nature, and data for the material is constantly renewed and updated as material is received and processed. The Permit describes procedures for potentially managing and recycling all these waste streams, under the "closed-loop" service.

Parts Washing Services: Under the Parts Washer Service program, SK provides customers with a parts washer unit and a solvent exchange service. The parts washer machines are serviced by SK representatives on a scheduled basis. Customers using this service include: automobile dealers; auto repair shops; garages; fleet maintenance shops; manufacturers of automobiles, trucks, airplanes, and heavy and light manufacturing equipment; machine shops; machine manufacturing and fabrication facilities; and other businesses.

The primary solvent used in SK parts washers is petroleum naphtha, which is commonly referred to as "mineral spirits" or "Stoddard Solvent". The parts washer machines are used for a specific purpose, to clean and degrease parts, at specific locations. As a result, the contaminants (e.g., oil, grease, carbon deposits) in SK's parts washer solvent appear to be of a consistent nature. The

spent solvent is typically a hazardous waste because it exhibits either the characteristic of ignitability and/or several toxicity characteristics, and SK has identified spent parts washer solvent as D001 / D004 / D005 / D006 / D007 / D008 / D009 / D010 / D011 / D018 / D019 / D021 / D022 / D023 / D024 / D025 / D026 / D027 / D028 / D029 / D030 / D032 / D033 / D034 / D035 / D036 / D037 / D038 / D039 / D040 / D041 / D042 / D043 hazardous waste. Generic pre-qualification information for spent parts washer solvent is regularly renewed or updated using analytical data from materials that are received and processed in the program.

When servicing a parts washer, SK representatives conduct visual inspections of the spent solvent to determine if the material may have been contaminated. Before collecting the material, the SK representative inspects the volume and color of spent parts washer solvent in each unit. Parts washers use 5-, 16-, or 30-gallon containers holding 5, 10 and 19 gallons of solvent, respectively. If no additional material has been added to the unit, the volume of spent solvents in the containers should not change. If the volume of waste in a given container exceeds the specified level, the SK service representative will sample the waste for laboratory testing or reject the waste. In addition, parts washer solvent changes color as it is used, and the specific color change is dependent on the type of equipment being cleaned. If the observed color of the spent solvent does not appear to be consistent with the type of equipment being cleaned, the SK service representative should sample the waste for possible contamination or reject the waste.

SK provides an aqueous parts washer fluids to some of its customers. These spent parts washer fluids are typically hazardous because of their toxicity characteristics, but they are not part of SK's "closed-loop" Parts Washer Service program. Rather than being recycled and returned to the customer, these aqueous waste streams are typically managed as hazardous wastewater, either in on-site wastewater treatment units or shipped off-site.

Other "Closed-Loop Services": The Permit also includes a description for receiving and processing spent immersion cleaner, and for receiving and processing spent paint gun solvent and waste paint related material. However, these recycling activities are not currently performed at this facility. Containers of hazardous waste immersion cleaner, hazardous waste paint gun solvent, and hazardous waste paint related material that are accepted under the TSD permit are not emptied here. Instead, they are placed in the facility's permitted container storage area until they are sent to another SK Recycle Center for processing.

Industry Specific Wastes: SK's "industry specific" waste sources include: dry cleaning establishments, used oil from automotive services, and machine and engine coolants. SK uses chemical analyses and knowledge of the industry to characterize each "industry specific" waste stream.

Dry Cleaning Services: The dry cleaner service provided by SK consists of a waste service for collection of dry-cleaner still bottoms, filter cartridges, and filter media from filters used to purify the dry-cleaning solvent during usage. From these wastes, SK recovers high purity perchloroethylene (tetrachloroethylene) via evaporation and fractional distillation. As part of the service, SK also sells recycled perchloroethylene and new filters to dry cleaner customers. Although the Permit includes a description for receiving and processing spent dry cleaning hazardous wastes, these recycling activities are not currently performed at this facility.

Containers of dry-cleaning hazardous wastes that are accepted under the TSD permit are not

emptied here. Instead, they are placed in the facility's permitted container storage area until they are sent to another SK Recycle Center for processing.

Used Oil: SK accepts used oils into the Safety-Kleen Oil Services (SKOS) used oil management program. Although it is not processed at the subject facility, used oil accepted into this program will eventually be re-refined into lubricating oils, or processed into an on-specification or off-specification used oil fuel. SK has developed pre-qualification, collection and analysis procedures to ensure that material handled in the used oil management program is defined as used oil; to ensure that the waste oils received can be re-refined into lubricants, processed into fuels, or treated as oily waters; and to protect against receipt of hazardous waste and Polychlorinated Biphenyls (PCBs).

SKOS does not require laboratory analysis for used oils from automotive generators. Used oils generated by other industrial customers, however, must be sampled and analyzed prior to the initial pickup. Industrial used oil samples are analyzed for total metals (arsenic, cadmium, chromium, lead); F-listed halogenated solvents; flash point; and PCB content. If analysis indicates that the material contains listed hazardous waste, the industrial account may not be included in the SKOS program.

SK's Lexington Service Center receives used oils from a variety of generators, including auto shops, power authorities, gasoline depots, service stations and companies that service vehicles. SK collects used oil from customers using a vacuum-truck, which is emptied into one of two storage tanks at the Lexington Service Center. At the time of collection, SKOS obtains new documentation from each generator certifying that the oil has not been mixed with listed hazardous waste or PCBs. Prior to pick-up, each shipment is tested for halogen by a field halogen test kit. If the field test results and the information provided by the generator supports that the material tested is nonhazardous, the material is collected. In addition, SKOS also collects a sample of each used oil pickup and retains the sample for 90 days. If the processing facility detects contamination (as described below), these samples may be necessary for analysis.

Bulk shipments of used oil are loaded into tanker trucks for transportation from the Lexington Service Center to an off-site Recycling Center for used oil processing. The contents of each holding tank at the off-site Recycling Center are sampled and analyzed before processing the used oil. If the analysis detects contamination, SK performs detailed sample analyses to identify the exact source of the contamination. First, samples from each bulk shipment that has been off-loaded into the contaminated tank are analyzed to identify the bulk shipment of unacceptable material. Then, detailed analyses are made on the retained samples taken from each individual source included in the contaminated bulk shipment until the exact source of the unacceptable material is identified. Depending on the nature of the contamination, SK will redirect the unacceptable waste oil to another of its recycling facilities, direct the shipments to a cement kiln or industrial furnace for energy recovery, or direct the material to a TSCA approved incinerator.

Engine Coolants: SK's antifreeze collection service consists of a waste service for collection of used antifreeze coolants from various vehicle service businesses including auto repair shops, service stations, and other companies that service vehicles. Spent antifreeze may typically be a yellowish green to blue in color with traces of discoloration due to ferric oxide (i.e., rust). The spent antifreeze may have a slight sheen from petroleum products and may have sediments in the

spent antifreeze from vehicle engines, rust, dirt, or other matter. The SK service representative visually inspects spent antifreeze prior to accepting it. If the appearance of the material is not consistent with the expected criteria, the service representative should collect a sample of the waste for analysis or request that the customer analyze the waste.

Spent antifreeze is collected in carboys or containers at a customer's place of business, and it is received at the Lexington facility in bulk tanker trucks and in 55-gallon containers. For each shipment of antifreeze received, a representative sample should be taken from the tanker truck or container before unloading. Samples are analyzed for physical appearance, flashpoint, PCB content, volatile organic content, and percent water to establish that the material matches the DOT shipping description, and to confirm that the material does not exhibit a characteristic of hazardous waste. Due to the potential for SK's analysis to demonstrate that the spent antifreeze does exhibit a characteristic of hazardous waste, the waste generated during the sampling procedures at the Lexington Operations Center is accumulated as D004 / D005 / D006 / D007 / D008 / D009 / D010 / D011 / D018 / D019 / D021 / D022 / D023 / D024 / D025 / D026 / D027 / D028 / D029 / D030 / D032 / D033 / D034 / D035 / D036 / D037 / D038 / D039 / D040 / D041 / D042 / D043 hazardous waste. Acceptable material is pumped into a storage tank for management at the Lexington Operations Center. Material in the tank is periodically pumped into a 7,500-gallon tanker truck for transport to another Recycling Center where SK processes it to recover ethylene glycol. Recovered ethylene glycol is sold to industry for reuse as manufacturing feedstock.

Lab Pack Wastes: The Lexington Recycle Center is permitted to receive laboratory wastes under the SK's lab pack program. These wastes are generated by customers in analytical laboratories and in research and development operations. The lab packs may contain a wide variety of chemicals including reagents, acids, caustics, discarded chemicals, and wastes containing metals. Although lab packs may contain a combination of waste codes, generators typically segregate the lab pack chemicals according to the hazard class as required by the applicable DOT regulations. Therefore, acids, caustics, corrosives and reactive materials should be packaged separately.

Although the Permit describes procedures for SK and the generator to open lab pack containers and consolidate wastes that are similar in characteristics (organic solvents, acids, etc.) for transportation off-site, this activity is not currently being done at the subject facility. Instead, the lab pack wastes received at the Lexington facility are currently managed on a "10-day" transfer basis before they are sent to another permitted TSD facility in the United States for treatment and disposal. SK reviews the manifest and labels on the containers for consistency and for the safe handling of these wastes.

Industrial Source Wastes: The SK Lexington facility is permitted to handle "industrial" source fluid wastes in bulk quantities or in containers. In general, SK's processing of these wastes would fall into one of the following three categories: toll recycling (customer provides the waste and SK recycles it to customer specifications); solvent recycling or recovery (SK combines like solvent wastes and recovers these solvents for resale as specification recycled product); or fuels blending (low value flammable, combustible, non-halogenated and halogenated solvents are blended to specification for energy recovery as kiln fuel for the cement industry).

Waste streams from "industrial" sources vary widely in composition, in application or use, and in

source industry. Therefore, “industrial” source generators must provide SK with a representative sample of each waste stream, so that the company can perform a pre-qualification analysis and a material survey prior to accepting the waste on-site. Using this information, SK categorizes the waste into its specific waste code and determines whether it is acceptable for processing.

Custom Distillation (Toll Processing): SK offers toll recycling services for facilities that use large quantities of organic solvents. Customers who utilize this service are those who wish to buy the distillation or extraction services offered by SK’s Recycle Centers rather than invest in the purchase of their own facilities and the training of their own personnel. Upon receipt of a shipment, the SK Recycling Center samples the load for shipment receipt analysis. The on-site laboratory analyzes the sample for volatile organic and PCB content to establish that the waste material received matches the manifest description and the pre-qualification characterization. The laboratory may also test for pH, percent water, physical appearance, specific gravity, and distillation performance to establish material quality and process settings for most efficient recovery. Data from the laboratory analysis is used to calculate yield data, and the analysis and calculations are all recorded and considered part of the confidential business record of the company.

Used solvents processed under the toll recycling program are processed by batch, each batch coming from a single customer. The specific batch material is isolated and processed separately so that the reclaimed solvent can be returned to the generator. SK does not take ownership of the toll recycling material, but only provides a recycling service. However, the still bottoms generated during the toll recycling process are managed as site-generated hazardous waste. SK and the customer establish specifications for both the used and the recovered solvents and determine what an acceptable yield of recovered solvent might be. The “yield” is that amount of solvent contained in the used stream that is returned to be reused, usually expressed as a percentage.

Industrial Solvent Processing: Although the Permit includes a description for receiving and processing spent industrial solvents for resale in the industrial market, these recycling activities are not currently performed at this location. The subject facility is permitted to recover industrial solvents that have, in general, been classified by the EPA as hazardous waste from non-specific sources (the F-series); and those that are not listed wastes but do exhibit the characteristic of ignitability. Under the Industrial Solvent Processing program, the flash distillation process would be used to separate the volatile solvent component from a non-volatile residue or still bottoms. The recycled solvent would be recovered to meet SK’s manufacturing specification and would then be offered for sale in the industrial market.

Used Solvent for Fuel Blending: Certain spent solvents cannot economically or physically be recovered for reuse. These are typically solvents of low intrinsic value, those where the user’s specifications are unattainable, or where the mixture cannot be efficiently separated because of the formation of azeotropes, overlapping, or close boiling ranges. However, these materials are suitable for SK’s fuels blending program, where the energy contained in the waste is recovered by burning as industrial furnace or boiler fuel. This waste stream is commonly referred to as Containerized Waste Service (CWS) and typically carries listed hazardous waste codes as well as hazardous waste toxicity codes and usually the ignitability characteristic code.

Although the Permit includes a description for producing solvent-based fuels by blending non-recoverable solvent mixtures with still bottoms generated from on-site solvent recovery, this activity is not currently being performed at this location. Instead, SK receives CWS material on a 10-day transfer basis, and then ships the containers to an outside vendor for use as waste derived fuels. Still bottoms generated from on-site solvent recovery are accumulated as hazardous waste and may also be sent off-site to a permitted TSD facility for fuels blending.

Site-Generated Waste: In addition to receiving waste from off-site generators under the Permit, the SK is also a LQG of hazardous waste. Waste streams generated by the facility include such wastes as: still bottom oils, which are the residual liquid (usually oil) or sludge remaining from the distillation or fractionation of a material to recover a product; evaporator solids, which are the residual solids from the Safety-Therm Evaporator process utilized to recover product solvents from waste sludges; and miscellaneous solids, which are the solids that result from various handling steps such as pipeline filters, settling or emptying of drums. According to the permit application, the facility recovers useable materials and recycles wastes whenever possible. Wastes generated by SK may be managed as accumulated waste for up to 90-days at the facility. If the material is still at SK after 90-days, it must be placed in properly permitted storage areas at the Recycle Center.

SK has been operating as an LQG of hazardous waste, a permitted hazardous waste TSD facility, a hazardous waste transporter, a large quantity handler of universal waste, a used oil transporter, and a used oil transfer facility at this location. The facility most recently notified of these activities as part of the third and fourth quarterly hazardous waste reports for the calendar year 2022. Hazardous wastes identified in the report include: waste D001 / D035 / F005 MEK; D001 / D006 / D007 / D008 / D018 waste petroleum naphtha; D001 / D027 / D035 / D039 waste flammable liquids; D002 waste corrosive liquids; D039 waste combustible liquid; D001 / D008 / D018 / D039 / D040 waste combustible liquid; D001 / D018 / F003 waste xylenes; D007 / D039 / D040 / F002 waste toxic organics; D039 / D040 aqueous brake solution; F001 / F002 / F003 / F004 / F005 synfuel; D001 / D008 / D018 / F003 / F005 waste paint related material; D001 / D018 / D035 / D039 / D040 waste paint related material; D007 / D008 / D039 / D040 / F002 waste perc bottoms and filters; D001 / D039 mineral spirits wastewater; D001 / D006 / D008 / D035 / D039 methyl ethyl ketone water. The universal wastes included batteries and lamps.

9) **Previous Inspection History**

SK was last inspected by the SCDHEC on August 5, 2021, for compliance with the State of South Carolina hazardous waste regulations. The facility was cited for not keeping a container closed, not marking or labeling with the words “hazardous waste”, not marking or labeling with hazard indicators, not keeping container(s) closed in the RCRA permitted storage, a valve near Tank 14 was equipped with an open-ended line.

SK was inspected by the EPA on August 15, 2017, for compliance with the RCRA regulations. The facility was cited for not keeping a container closed, not marking a date on a container, failing to comply with the permit condition for not marking tank equipment in such a manner that it can be distinguished readily from other pieces of equipment and maintaining and operating tank and secondary containment systems in good condition.

10) **Opening Conference**

On February 2, 2023, the EPA inspector William Kappler, accompanied by SCDHEC inspectors Elizabeth DeLanghe and Gerald Shealy, arrived at SK at approximately 8:50 a.m. The inspectors identified themselves, explained the purpose of the visit at the front lobby reception area and were asked to sign a visitor log. John E. Hook, the Facility General Manager received the inspectors in the lobby and proceeded to his office. The inspectors were joined by Todd Blake, Senior Environmental Compliance Manager by conference call for an opening conference. The inspectors introduced themselves, presented their credentials and explained the purpose of the visit. The EPA inspector described the anticipated use of a digital camera during the inspection and provided a written list of the records needed for review. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information provided to the EPA. SK did not assert a business confidentiality claim.

SK provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before SK representative John E. Hook and Steve Hopkins (SK representative) escorted the inspectors on a tour of the facility operations.

11) **Inspection Observations**

The inspectors observed the facility is surrounded by a six-foot-high chain link and entry into the facility is controlled by gates. The gates were open since the facility was operating upon arrival by inspectors. The inspectors observed warning signs posted on the entry gates and observed the fencing within the areas of the inspection.

The facility's internal communications system consists of telephones, portable two-way radios and a paging system for internal communications. The telephones appeared to be in several areas of the facility. The inspectors observed fire extinguisher in several areas of the facility and an overhead fire suppression system in the permitted container storage areas. The inspectors observed eye wash and overhead showers in the permitted area. Emergency, spill control personnel protective equipment was also observed.

Permitted Container Storage Areas

The permitted container storage area is designated as areas 1A, 1B and 1C. Hazardous waste and non-hazardous waste is stored in these areas. Areas 1A and 1B are container storage for SK's customers (generators). The central accumulation area (90-day or less storage) and the universal waste storage is in Area 1B. Area 1C, in general, is for electronic waste and pharmaceutical waste from generators.

Inbound/Outbound Area

Steve Hopkins with SK joined the inspection. The inspector observed a forklift was used to off-

load containers from trailers parked at the loading dock. The containers were being transferred directly to their designated container storage areas. The container labels are marked with a destination facility two letter marking indicating the container storage area: Reidsville (RD), Chattanooga (CH), Spring Grove (SG), Deer Park (DE). SK also uses a bar code on a label for each container for internal sorting purposes that identifies the waste as hazardous waste, non-hazardous waste and to indicate it's hazard. The inspector observed containers of hazardous waste in these areas (Photographs 1, 2, 3, 4 and 6)

Permitted Container Storage Area 1A and 1B

Inspectors observed eight 55-gallon containers of unused off-specification methanol (Photographs 7 and 8). SK indicated that the methanol is exempt as a hazardous waste and will be shipped for energy recovery. The inspectors reviewed the waste profile.

The inspectors observed a 55-gallon container labeled as hazardous waste by the generator. SK labeled the container with a non-hazardous waste label after determining and waste profiling the waste stream (Photograph 9).

Inspectors observed all containers inspected were closed, in good condition, with aisle space, on pallets stacked with two containers, labeled with the words "hazardous waste", marked with storage dates less than one year and marked or labeled with a hazard indicator.

Drum Shed 1A SAA

Hazardous waste debris, rags and floor sweepings generated in the general permitted container areas is accumulated in a SAA. The inspectors observed one 55-gallon container accumulating hazardous waste in this SAA. The container was closed, in good condition, labeled with the words "hazardous waste" and labeled with a flammable hazard indicator, but not a toxic hazard indicator (Photograph 5). The SK representative marked the container's hazardous waste label with the word "toxicity".

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(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 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Permitted Container Storage Area 1B - Universal Waste Storage

The inspectors observed several containers of universal waste lamps on pallets in this area. The inspectors observed one eight-foot container accumulating waste lamps. The container was not closed (Photograph 10). The containers were in good condition, labeled with the words "universal waste" and marked with dates less than one year. The SK representative closed the container (Photograph 11).

Pursuant to S.C. Code Ann. Regs. 61-79.273.33(d)(1) [40 C.F.R. § 273.33(d)(1)], a large

quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Permitted Container Storage Area 1B – Central Accumulation Area

SK's central accumulation area (90-day or less storage) is in this area. The inspectors observed 24, 55-gallon containers, one 85-gallon container and one five-gallon container accumulating hazardous waste flammable liquids. The inspectors observed one 55-gallon container was not marked with an accumulation start date (Photograph 12). The SK representative marked the container with the date February 1, 2023, based on the knowledge of the date on the adjacent container. The inspectors observed the containers were closed, in good condition with aisle space, stacked two high on pallets, labeled with the words "hazardous waste" and labeled with hazard indicators.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(C) [40 C.F.R. § 262.17(a)(5)(i)(C)], a large quantity generator must mark or label its containers with the date upon which each period of accumulation begins clearly visible for inspection on each container

Drum In and Drum Out

Inbound 5-gallon to 16-gallon containers of hazardous waste aqueous brake cleaner, lacquer thinner and immersion cleaner are stacked and shrink-wrapped on pallets for outbound shipment to the Safety Kleen Dalton, Ohio facility. Some 55-gallon containers are also placed on pallets for outbound shipment. Outbound dry- cleaning filters are shipped to the Safety Kleen Hebron, Ohio facility. The inspectors observed several pallets of containers prepared for shipment. The inspectors observed the containers were closed, in good condition, with aisle space, on pallets, labeled with the words "hazardous waste", marked with storage dates less than one year and marked or labeled with a hazard indicator.

Permitted Container Storage Area 1C - Electronic Waste and Pharmaceutical Waste

Electronic waste consisting of TVs, computer equipment and children's toys was observed in this area. Inspectors also observed a small (18"x18"x12") container that was labeled with the original generator hazardous waste label and marked as acutely toxic, consolidated retail pharmaceutical wastes (Photograph SCDHEC). There was also a "Poison" hazard indicator on the box. SK added a label during their acceptance process indicating the pharmaceutical waste (CONS-PHARM), containing Warfarin & Salts as non-hazardous. It was later confirmed in SK's email response dated February 10, 2023, to a verbal request from the inspectors during the inspection, that SK determined the consolidated pharmaceutical waste was a hazardous waste for toxicity and an error had occurred during processing. SK should follow their waste analysis plan and procedures for confirming any containers marked or labeled as hazardous waste.

Antifreeze/Machine Returns SAA

Empty part washers returned by customers are stored in this room. Anti-freeze is also stored in this room. The inspectors observed one 55-gallon container accumulating hazardous waste liquid and solids in the SAA. The container was closed, in good condition, labeled with the words "hazardous waste", and labeled with a flammable hazard indicator. The inspectors observed the

hazardous waste label marked with toxic codes (D004/D005/D006/D007/D008/D009/D010/D011/D018/D019/D021/D022/D026/D027/D028/D029/D034/D035/D038/D039/D040/D043), but not marked or labeled with a toxic hazard indicator (Photograph 13). The SK representative labeled the container with a toxic and a flammable solid hazard indicator (Photograph 14).

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(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 an indication of the hazards of the contents.

Branch Sales to Service SAA

Hazardous waste solids and hazardous waste liquids are generated in two SAAs. The inspectors observed one 55-gallon container accumulating waste solid debris (D001, D004, D005, D040) in one SAA and one 55-gallon container accumulating waste solvent sludge (D001, D006, D008, D018, D039, D040) in a second SAA. The inspectors observed the container of waste solids debris had liquid on the container's closed lid (Photographs 17 and 18) and was not marked or labeled with a flammable solids hazard indicator (Photograph 16). The container was labeled with the words "hazardous waste" and marked with the hazard indicator for toxicity and ignitability. The inspectors recommended larger toxicity and ignitability hazard indicators on the container. SK representative used an absorbent rag to remove the liquid from the container's lid. The inspectors observed the container of waste solvent sludge was closed, labeled with words "hazardous waste" and marked with the hazard indicator for toxicity and ignitability. The container was not marked or labeled with a flammable solids hazard indicator (Photograph 15). SK representative labeled the container of waste solids debris (Photograph 21) and the container of waste solvent sludge (Photograph 20) with larger hazard indicators, including a flammable solids hazard indicator.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], a generator must mark or label its container with the following: (ii) An indication of the hazards of the contents

Pursuant to S.C. Code Ann. Regs. 61-79.262.90, a generator must clean up any hazardous waste discharge that occurs during generation or processing or storage and take such other action as may be required or approved by Federal, State or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment.

Permitted Tank 6B

The inspectors observed Tank Farm 6B has five 20,000-gallon above ground dish-bottom carbon steel tanks (tank 212, 213, 214, 215 and 216), located near the Branch Sales to Service. SK representative indicated hazardous waste is stored only in tank 213. The remaining tanks store used oil, used oil and oily water and clean solvent. SK representative indicated hazardous waste is shipped off-site every ten to fourteen days. The inspectors reviewed the records for the shipping dates. The inspectors observed the tank was labeled with words "hazardous waste", labeled with hazard indicators and the tank farm secondary containment system appeared in good condition. The inspectors inspected the tank ancillary equipment and observed each piece of equipment was physically tagged/marked in such a manner to be distinguished readily from other pieces of equipment. The EPA inspector observed tags V46058, OE4612, and OE4611 to

compare to 40 C.F.R. 264. Subpart BB records. The inspectors observed one tag identifying a closed dead-end fitting that was covered by paint and could not be read (Photograph 19). SK provided a photograph of the tag (OE4610) after it had been cleaned in their email response dated February 10, 2023.

Pursuant to the Hazardous Waste Permit SCD 077 995 488, Module IV – Tanks, Section IV.D Operating Requirements, Part IV.D.3 Air Emission Standards, the Permittee shall insure that all hazardous waste placed in tanks is managed so that compliance with R.61-79.264.200 is met. Specifically, 25 S.C. Code Ann. Regs. 61-79.264.200 [40 C.F.R. § 264.200] requires the owner or operator to manage all hazardous waste placed in a tank in accordance with the applicable requirements of Subparts AA, BB, and CC of this part. Pursuant to 25 S.C. Code Ann. Regs. 61-79.264.1050(d) [40 C.F.R. § 264.1050(d)], which is a condition of Subpart BB, 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.

Truck Station No.: 3 SAA

Hazardous waste flammable liquid generated in the truck station is accumulated in a SAA. The inspectors observed one 55-gallon container accumulating hazardous waste xylene and toluene (F001, F002, F005, F003, D001, D004-D011, D018, D019, D021 and D022) in this SAA. The container was closed, in good condition, labeled with the words “hazardous waste” and labeled with flammable solids, flammable liquids and toxicity hazard indicators.

Permitted Tank Farm 3B

The inspectors observed Tank Farm 3B has eight 20,000-gallon above ground dish-bottom tanks (tank 81, 82, 83, 85, 86, 87, 88, and 90) located at the Recycle Center. The tanks are constructed of carbon steel, except tank 88 (stainless steel). SK representative indicated hazardous waste is stored in tanks 81, 85, 86, 88, and 90. The remaining tanks store product material and in-process material. The inspectors observed the tanks were labeled with the words “hazardous waste”, labeled with hazard indicators and the tank farm secondary containment system appeared in good condition. The inspectors reviewed the records indicating hazardous waste was on average shipped every ten to fourteen days. The inspectors observed that each piece of the tank ancillary equipment was physically tagged/marked in such a manner to be distinguished readily from other pieces of equipment. The EPA inspector observed the tank 81 tag TF44347 to compare to 40 C.F.R. 264. Subpart BB records. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read (Photographs 22, 23, 24, and 25).

Pursuant to the Hazardous Waste Permit SCD 077 995 488, Module IV – Tanks, Section IV.D Operating Requirements, Part IV.D.3 Air Emission Standards, the Permittee shall insure that all hazardous waste placed in tanks is managed so that compliance with R.61-79.264.200 is met. Specifically, 25 S.C. Code Ann. Regs. 61-79.264.200 [40 C.F.R. § 264.200] requires the owner or operator to manage all hazardous waste placed in a tank in accordance with the applicable requirements of Subparts AA, BB, and CC of this part. Pursuant to 25 S.C. Code Ann. Regs. 61-79.264.1050(d) [40 C.F.R. § 264.1050(d)], which is a condition of Subpart BB, 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.

Permitted Tank Farm 3A

The inspectors observed Tank Farm 3A has one 10,000-gallon (tank 77) and five 20,000-gallon above ground dish-bottom tanks (tank 73, 75, 76, 77, 78, and 80) located at the Recycle Center. The tanks are constructed of carbon steel, except tank 80 (stainless steel). SK representative indicated hazardous waste is stored in tanks 75, 76, 77 and 78. The inspectors observed the tanks were labeled with the words “hazardous waste”, labeled with hazard indicators and the tank farm secondary containment system appeared in good condition. The inspectors reviewed the records indicating hazardous waste was on average shipped every ten to fourteen days. The inspectors observed that each piece of the tank ancillary equipment was physically tagged/marked in such a manner to be distinguished readily from other pieces of equipment. The EPA inspector randomly observed tags F-43206, F43002, V43001 and F43003 on the tanks to compare to 40 C.F.R. 264. Subpart BB records. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read.

Pursuant to the Hazardous Waste Permit SCD 077 995 488, Module IV – Tanks, Section IV.D Operating Requirements, Part IV.D.3 Air Emission Standards, the Permittee shall insure that all hazardous waste placed in tanks is managed so that compliance with R.61-79.264.200 is met. Specifically, 25 S.C. Code Ann. Regs. 61-79.264.200 [40 C.F.R. § 264.200] requires the owner or operator to manage all hazardous waste placed in a tank in accordance with the applicable requirements of Subparts AA, BB, and CC of this part. Pursuant to 25 S.C. Code Ann. Regs. 61-79.264.1050(d) [40 C.F.R. § 264.1050(d)], which is a condition of Subpart BB, 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.

Tank Farm 1

The inspectors observed Tank Farm 1 has 16 above ground carbon steel tanks for the storage of hazardous waste located at the Recycle Center. The tanks range from 10,000 gallons to 20,000 gallons (tanks 05, 06, 10, 11, 12, 13, 14, 16, 17, 18, 19, 21, 22, 23, 24 and 25). Tank 19 was empty and out of service at the time of the inspection. The inspectors observed the tanks were labeled with words “hazardous waste” and labeled with hazard indicators.

The inspectors observed the floor of the secondary containment and around the tanks was showing significant wear and deterioration. Wear and deterioration were observed in the corner next to Tank 21, where inspectors observed gaps on the floor and the paint/sealant was peeling away and cracking (Photographs 26 and 27).

The inspectors observed the floor of the secondary containment and pad around the base of tank 23 (Photograph 28) tank 19 (Photographs 29 and 30) and tank 14 (Photographs 31 and 32) had gaps and the paint/sealant was peeling away and cracking.

The inspectors observed rainwater on the floor of the secondary containment from the ongoing rain event. The inspectors observed several tags identifying pieces of equipment (pipe joints/connections, valves, pumps, ports, dead-end pipes, the distribution manifold) were covered with paint and could not be read (Photographs 33 through 39). SK provided the schematic for the

distribution manifold with labels in an email dated February 10, 2023.

Pursuant to the Hazardous Waste Permit SCD 077 995 488, Module IV – Tanks, Section IV.D Operating Requirements, Part IV.D.3 Air Emission Standards, the Permittee shall insure that all hazardous waste placed in tanks is managed so that compliance with R.61-79.264.200 is met. Specifically, 25 S.C. Code Ann. Regs. 61-79.264.200 [40 C.F.R. § 264.200] requires the owner or operator to manage all hazardous waste placed in a tank in accordance with the applicable requirements of Subparts AA, BB, and CC of this part. Pursuant to 25 S.C. Code Ann. Regs. 61-79.264.1050(d) [40 C.F.R. § 264.1050(d)], which is a condition of Subpart BB, 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.

Pursuant to the Hazardous Waste Permit SCD 077 995 488, Module IV – Tanks, Section IV.C Secondary Containment and Integrity Assessments, the Permittee shall design, construct, and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in Section D-2 of the approved Permit application. Specifically, Section D-2f(1) of the approved Permit application (Plans and Description of the Design, Construction, and Operation of Secondary Containment System) states that the base of the secondary containment will be coated with a chemical resistant sealant to prevent migration of the waste through the concrete base.

Pursuant to the Hazardous Waste Permit SCD 077 995 488, Module IV – Tanks, Section IV.C Secondary Containment and Integrity Assessments, the Permittee shall design, construct, and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in Section D-2 of the approved Permit application. Specifically, Section D-2(f)(1)(b) of the approved Permit application (Requirements for Secondary Containment and Leak Detection) states the concrete surface will be coated with a chemical resistant sealant to prevent migration of the waste through the concrete base.

Tanker Tunnel SAA

Hazardous waste debris and liquid drippings from tanker loading and unloading operations is accumulated in a SAA. The inspectors observed an empty five-gallon container used to temporarily store drippings during the transfer of waste. The inspectors observed one 55-gallon container accumulating hazardous waste debris (gloves and rags) in this SAA. The container was closed, in good condition, labeled with the words “hazardous waste” and labeled with a hazard indicator.

Maintenance Shop

Hazardous waste was not observed accumulating in this area at the time of this inspection.

Quality Control Laboratory

Laboratory staff sample from bulk units and tankers. Test procedures include pH, flash point, PCBs, percent solids, and density. Heavy metals testing is conducted on the aqueous parts washer solvent.

Fume Hood #1 SAA

The inspectors observed one 2.5-gallon container in the fume hood accumulating waste toluene and xylene in the Fume Hood #1 SAA. The container was closed, in good condition, labeled with the words “hazardous waste” and labeled with a hazard indicator. The inspectors observed a 10-gallon safety container accumulating waste contaminated wipes (MEK and toluene). The container was closed, in good condition, labeled with the words “hazardous waste” and labeled with a hazard indicator.

Fume Hood #3 SAA

The inspectors observed one five-gallon container accumulating waste xylene and toluene and one 2.5-liter container accumulating waste sulfuric acid/xylene and toluene in the Fume Hood #3 SAA. The containers were closed, in good condition, labeled with the words “hazardous waste” and labeled with hazard indicators. The inspectors observed a 10-gallon safety container accumulating waste contaminated wipes (xylene and toluene). The container was closed, in good condition, labeled with the words “hazardous waste” and labeled with a hazard indicator.

Records Review

During the inspection, SCDHEC inspectors reviewed the hazardous waste inbound and outbound manifests, land disposal restriction records, waste analysis plan, closure plan, contingency plan, arrangements with the local authorities, hazardous waste training records, container and tank inspection records, waste minimization report and hazardous waste quarterly reports. The EPA inspector reviewed the quick reference guide, air monitoring records, tank assessment and integrity records, closure plan, annual-adjusted for inflation cost estimate for facility closure and the 10-day drum in/drum out transfer records.

RCRA Permit

SK maintains the RCRA permit and application at the facility.

Manifests

Several inbound hazardous waste manifests were randomly reviewed in January 2021, August 2021, December 2021, January 2022, August 2022, October 2022, December 2022 to February 2, 2023. Several outbound hazardous waste manifests were reviewed in January 2022, April 2022, June 2022, July 2022, August 2022, October 2022, November 2022 and December 2022.

Waste Determination/Waste Profile

Waste profile 814239 for the unused off-specification methanol was reviewed.

10-Day Drum In/Drum Out Transfer Records

Although the Permit allows SK to store hazardous waste in drum up to one year, SK maintains a 10-day drum in/drum out electronic spreadsheet showing the dates drums are received for permitted storage and the dates drums are shipped out of permitted storage to an off-site destination facility. The inspectors reviewed the electronic record for the month of September 2022 and January 2023.

Tank Assessment and Integrity Records

The most recent tank assessment for tanks in Tank Farm No. 1 and Tank Farm No. 6B was performed on October 14, 2022. The inspected reviewed the tank wall thickness measurements for tank 5 (Tank Farm 6B) and tank 213 (Tank Farm 1) The assessment also observed that there

were areas in the Tank Farm 1 around the base of some tanks and the floor of the secondary containment had cracks, gaps and the sealant separating from the concrete at different locations of the secondary containment system.

RCRA Organic Air Emissions - Standards for Equipment Leaks.

SK controls air emissions from hazardous waste tanks using Tank Level 1 controls and from hazardous waste containers using Container Level 1 controls. Method 21 inspection documentation for ancillary equipment showed that the equipment associated with the management of hazardous waste contained a chemical composition of at least 10% by weight of organic constituents that were in light liquid service. The facility has implemented a Leak Detection and Repair (LDAR) program in accordance with the emission monitoring requirements for equipment/devices subject to RCRA Part 264 Subpart BB. The equipment/devices are also physically tagged/marked in such a manner to be distinguished readily from other pieces of equipment. The inspectors observed during the walk-through that several tags could not be read, due to the overspray of paint during paint maintenance operations.

Quick Reference Guide

The inspectors observed the quick reference guide did not include a map of the locations of where SAA and CAA hazardous wastes are generated and accumulated and routes for accessing these wastes and on the water supply flow rate. SK representative amended the information (except for the water supply flow rate) in the quick reference guide (QRG), prior to inspectors exiting the facility.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(b)(4) and (b)(6) [40 C.F.R. § 262.262(b)(4) and(b)(6)], and is a condition of the LQG Permit Exemption, a generator's quick reference guide to the contingency plan must include the following elements:

A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes and the flow rate from the water supply.

SK provided the completed map with estimated water supply flow rate in an email dated February 10, 2023. SK provided the receipts on the arrangements made by email on February 14, 2023, with the local emergency responders on the amended QRG.

Hazardous Waste Quarterly Reports

The quarterly reports were reviewed for the first, second, third and fourth quarters in calendar year 2022.

The inspectors reviewed the contingency plan, arrangements with the local authorities, hazardous waste training records, job titles, position descriptions, container and tank inspection records, waste minimization report, waste analysis plan, closure plan and the annual-adjusted for inflation cost estimate for facility closure.

12) Closing Conference

The inspectors conducted a closing conference with John E. Hook. Todd Blake and Jim Childress, Vice President of Compliance for SK attended by conference call. During this

meeting, the inspectors stated their preliminary conclusions of the inspection.

13) **Sampling Overview**

Sampling was not conducted.

14) **List of Appendices**

Appendix 1 – Photograph Log:
Photos taken on: February 2, 2023
Photos taken by: William Kappler
Samsung Camera (Model WB250F)
EPA Property Tag# S75917

15) **Signed**

WILLIAM KAPPLER

Digitally signed by WILLIAM
KAPPLER

Date: 2023.03.20 19:23:54 -04'00'

William Kappler
Physical Scientist

Date

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.03.21 13:06:24 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

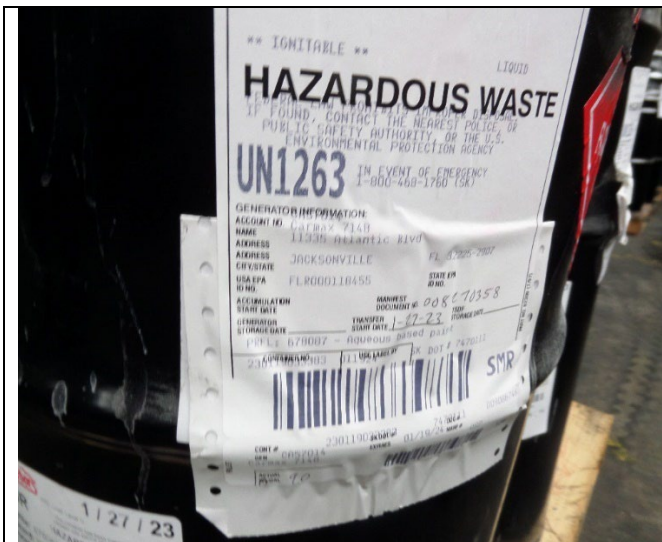
Safety Kleen Systems, Inc., Lexington
RCRA CEI Photographs



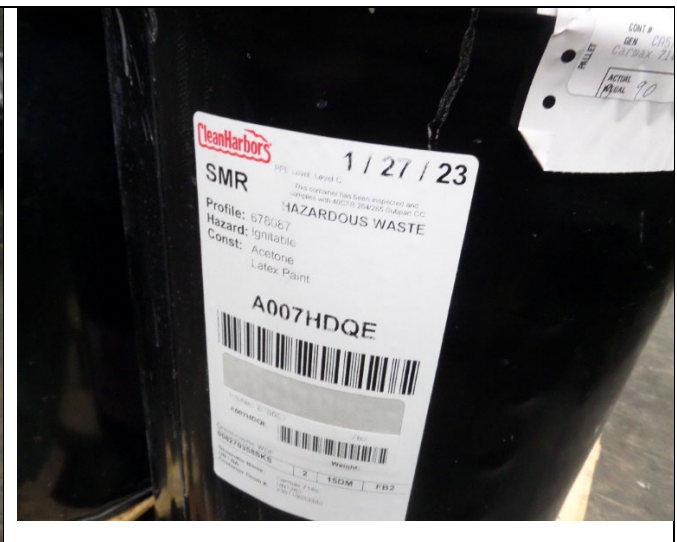
Permitted Container Inbound/Outbound Area. Observed container of hazardous waste transferred to designated container storage area. Container closed, in good condition, labeled and dated. Photograph 1 taken at 10:03 a.m.



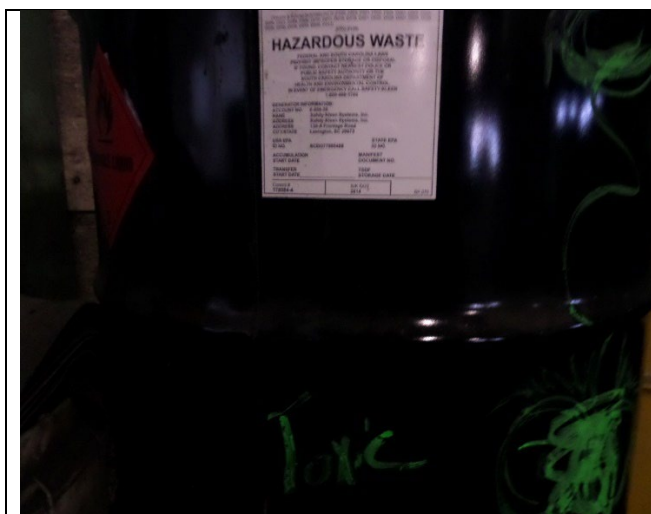
Permitted Container Inbound/Outbound Area. Observed container of hazardous waste transferred to designated container storage area. Container closed, in good condition, labeled and dated. Photograph 2 taken at 10:03 a.m.



Permitted Container Inbound/Outbound Area. Observed container of hazardous waste transferred to designated container storage area. Container closed, in good condition, labeled and dated. Photograph 3 taken at 10:07 a.m.



Permitted Container Inbound/Outbound Area. Observed container of hazardous waste transferred to designated container storage area. Container closed, in good condition, labeled and dated. Photograph 4 taken at 10:07 a.m.



Permitted Container Storage Area - Drum Shed 1A SAA. Observed a 55-gallon container of hazardous waste in the SAA. Container not marked/labeled with a toxic hazard indicator. SK representative marked the container with a toxic hazard indicator. Photograph 5 taken at 10:17 a.m.



Permitted Container Inbound/Outbound Area. Container labeled with a bar code. Photograph 6 taken at 10:23 a.m.



Permitted Container Storage Area 1A and 1B. The inspectors observed eight 55-gallon container of unused methanol for energy recovery. Photograph 7 taken at 10:30 a.m.



Permitted Container Storage Area 1A and 1B. The inspectors observed eight 55-gallon container of unused methanol for energy recovery. Photograph 8 taken at 10:30 a.m.



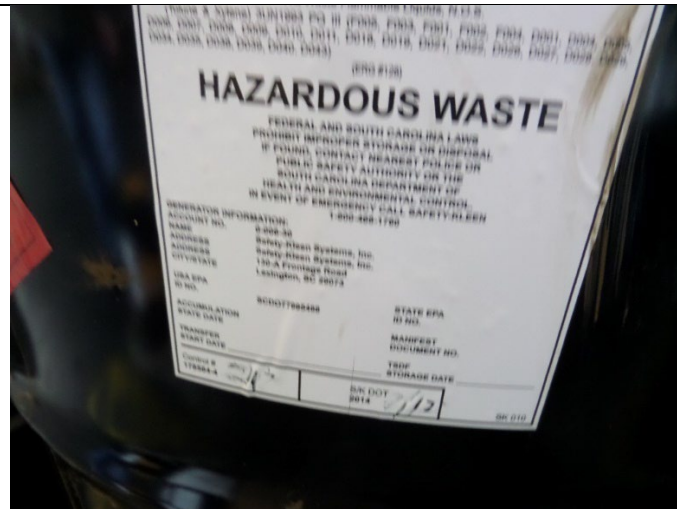
Permitted Container Storage Area 1A and 1B. The inspectors observed a 55-gallon container labeled as hazardous waste by the generator. SK labeled the container with a non-hazardous waste after determining and waste profiling the waste stream. Photograph 9 taken at 10:37 a.m.



Permitted Container Storage Area 1B – Universal Waste. The inspectors observed one eight-foot container of lamps not kept closed. Photograph 10 taken at 10:40 a.m.



Permitted Container Storage Area 1B – Universal Waste. The SK representative closed the container of lamps. Photograph 11 taken at 10:42 a.m.



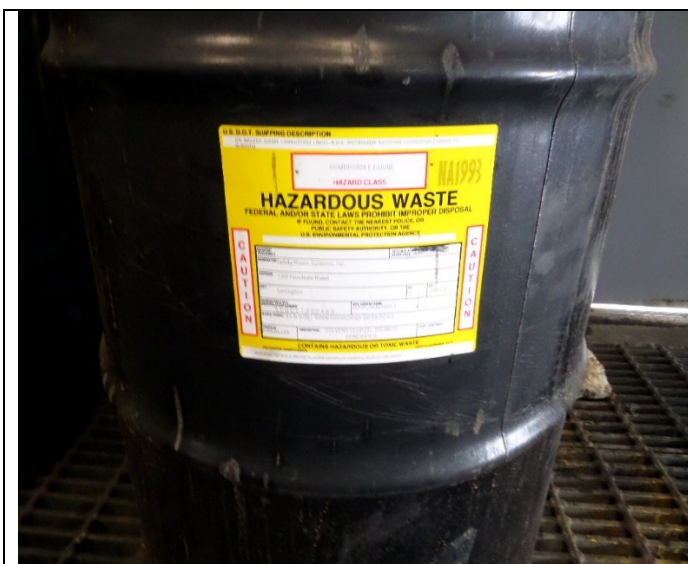
Permitted Container Storage Area 1B– Central Accumulation Area (90-Day). The SK representative marked the container with date February 1, 2023. Photograph 12 taken at 11:11 a.m..



Antifreeze/Machine Return Area. The inspectors observed a 55-gallon container not labeled with all hazard indicators. Photograph 13 taken at 11:18 a.m.



Antifreeze/Machine Return Area. SK representative labeled the container with all hazard indicators. Photograph 14 taken at 11:21 a.m.



Branch Sales to Service. Container of waste solvent sludge missing flammable solids hazard indicator. Photograph 15 taken at 11:28 a.m.



Branch Sales to Service. Container of waste solids debris missing flammable solids hazard indicator. Photograph 16 taken at 11:32 a.m.



Branch Sales to Service. Container of waste solids debris with waste liquid on container lid and missing flammable solids hazard indicator. Photograph 17 taken at 11:32 a.m.



Branch Sales to Service. Container of waste solids debris with waste liquid on container lid and missing flammable solids hazard indicator. Photograph 18 taken at 11:32 a.m.



Permitted Tank Farm 6B. The inspectors observed one tag (above the fitting) that was completely covered by paint and unable to be read. SK provided a photograph of the tag (OE4610) after it had been cleaned in their email response dated February 10, 2023. Photograph 19 taken at 11:43 a.m.



Branch Sales to Service. SK representative labeled the container of waste solvent sludge with larger hazard indicators. Photograph 20 taken at 11:45 a.m.



Branch Sales to Service. SK representative labeled the container of waste solids debris with hazard indicators. Photograph 21 taken at 11:45 a.m.



Permitted Tank Farm 3B. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 22 taken at 11:55 a.m.



Permitted Tank Farm 3B. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 23 taken at 11:55 a.m.



Permitted Tank Farm 3B. The inspectors observed the tag (tank connection port) identifying pieces of equipment covered by paint and could not be read. Photograph 24 taken at 12:00 p.m.



Permitted Tank Farm 3B. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 25 taken at 12:00 p.m.



Permitted Tank Farm 1. The inspectors observed the secondary containment in the corner adjacent to Tank 21, showed signs of gaps and the paint/sealant was cracked and peeling away from the concrete floor in this area. Photograph 26 taken at 12:13 p.m.



Permitted Tank Farm 1. The inspectors observed the secondary containment in the corner adjacent to Tank 21, showed signs of gaps and the paint/sealant was cracked and peeling away from the concrete floor in this area. Photograph 27 taken at 12:13 p.m.



Permitted Tank Farm 1. The inspectors observed the secondary containment next to Tank 23, showed signs of gaps and the paint/sealant was cracked and peeling away from the concrete floor in this area. Photograph 28 taken at 12:14 p.m.



Permitted Tank Farm 1. The inspectors observed the secondary containment next to Tank 19, showed signs of gaps and the paint/sealant was cracked and peeling away from the concrete floor in this area. Photograph 29 taken at 12:15 p.m.



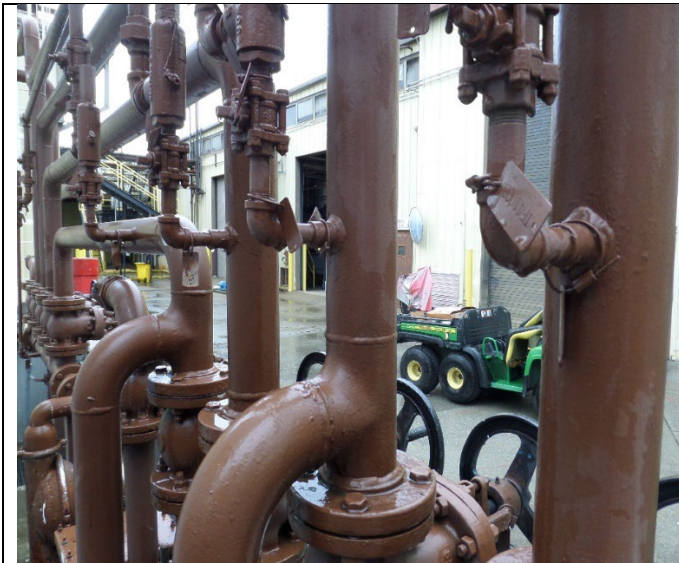
Permitted Tank Farm 1. The inspectors observed the secondary containment next to Tank 19, showed signs of gaps and the paint/sealant was cracked and peeling away from the concrete floor in this area. Photograph 30 taken at 12:16 p.m.



Permitted Tank Farm 1. The inspectors observed the secondary containment next to Tank 14, showed signs of gaps and the paint/sealant was cracked and peeling away from the concrete floor in this area. Photograph 31 taken at 12:17 p.m.



Permitted Tank Farm 1. The inspectors observed the secondary containment next to Tank 14, showed signs of gaps and the paint/sealant was cracked and peeling away from the concrete floor in this area. Photograph 32 taken at 12:17 p.m.



Permitted Tank Farm 1, Distribution Manifold. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 33 taken at 12:20 p.m.



Permitted Tank Farm 1, Distribution Manifold. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 34 taken at 12:21 p.m.



Permitted Tank Farm 1, Distribution Manifold. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 35 taken at 12:21 p.m.



Permitted Tank Farm 1, Distribution Manifold. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 36 taken at 12:21 p.m.



Permitted Tank Farm 1, Distribution Manifold. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 37 taken at 12:22 p.m.



Permitted Tank Farm 1, Distribution Manifold. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 38 taken at 12:23 p.m.



Permitted Tank Farm 1, Distribution Manifold. The inspectors observed several tags identifying pieces of equipment covered by paint and could not be read. Photograph 39 taken at 12:24 p.m.



Permitted Container Storage Area 1C - Electronic Waste and Pharmaceutical Waste. SK confirmed the container was storing hazardous waste. The inspectors observed the container of pharmaceutical waste (CONS-PHARM), containing Warfarin & Salts was not marked with a date. SCDHEC Photograph taken at 11:15 a.m.