



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Bryan Jones
Director, EHS
Harsco, Inc
933 First Avenue, Suite 200
King of Prussia, PA 19406
bjones@harsco.com

Dear Bryan Jones:

On March 7, 2023, the U.S. Environmental Protection Agency Region 4 Air Enforcement Branch conducted a partial compliance inspection of Allworth, LLC, located in Birmingham, Alabama. We have enclosed the final report generated for this inspection (Enclosure).

If you have any questions, please contact me at (404) 562-9206, or by email at hughes-fairley.rosalyn@epa.gov.

Sincerely,

ROSALYN

HUGHES FAIRLEY

Rosalyn Hughes Fairley
Environmental Engineer
South Air Enforcement Section

Digitally signed by ROSALYN
HUGHES FAIRLEY
Date: 2023.05.10 07:58:21
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Enclosure

**ENCLOSURE
INSPECTION REPORT**

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: Allworth, LLC.

Location (Address): 500 Medco Rd, Birmingham, AL 35217

Inspection Date: March 7, 2023

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

PROGRAMMATIC ID: ALJEF0000107300018

PERMIT NUMBER: 4-07-0018-0001-01, 4-07-0018-0053-01; 4-07-0018-0054-01;
4-07-0018-0055-01; 4-07-0018-0061-01; 4-07-0018-0062-01

EPA Region 4 Investigator(s)/Inspector(s):

1. Rosalyn Hughes Fairley, Environmental Engineer
2. Sharron Porter, Environmental Engineer
3. Kevin Taylor, Environmental Engineer

State/Local Investigator(s)/Inspector(s):

1. Virnita Ward, Environmental Health Specialist
2. Craig Tucker, Environmental Health Program Supervisor

Person(s) Contacted at Facility (Name and Title):

1. Bryan Jones, Director, EHS
2. Terry Thompson, Facility Manager

Report Prepared by: Rosalyn Hughes Fairley

FACILITY INFORMATION
A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Off-site Waste Recycling Operations
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	4-07-0018-0001-01, 4-07-0018-0053-01; 4-07-0018-0054-01; 4-07-0018-0055-01; 4-07-0018-0061-01; 4-07-0018-0062-01
3. Air permit issuance date.	August 1, 2008
4. Air permit expiration date.	No Expiration Date
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Minor
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	State Implementation Plan
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Tanks and process vents
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	NA

B. Process Description

Allworth, LLC operates a storage, recycling, and reclamation facility for a variety of used solvents. Allworth was acquired approximately 3 years ago by Clean Earth Inc. which is why Clean Earth is referenced in the report. Allworth employs approximately 50 people and operates 3–8-hour shifts, five days a week.

Allworth has two waste tank systems (TS-1 and TS-2) and one product tank system. TS-2 system is for its incoming waste streams and TS-1 for its outgoing products. TS-2 Tank system (F-tanks) is for the incoming waste solvents and chemicals. Waste solvents and other spent chemicals are received by tanker trucks and pumped into the facility's storage F-tanks, which are as follows:

Permit Number	Tank
4-07-0018-0053-01	6,000-Gallon Bulk Storage Tank (Contaminated Wastewater) Tank ID# W-1 (TS-1)
4-07-0018-0054-01	6,000-Gallon Bulk Storage Tank (Contaminated Wastewater) Tank ID# W-2 (TS-1)
4-07-0018-0055-01	6 – 6,000-Gallon Bulk Storage Tanks (Solvent for Recovery) F-Tanks (1 thru 6) TS-2
4-07-0018-0061-01	4,100-Gallon Bulk Storage Tank (Waste Oil) Tank ID# O-1 (TS-1)
4-07-0018-0062-01	18,000-Gallon Bulk Storage Tank (Sludge Tank) Tank ID# B-5 (TS-1)
4-07-0018-0064-01	18,000-Gallon Bulk Storage Tank (Sludge Tank) Tank ID# B-7 (TS-1)

Permit Number 4-07-0018-0001-01 regulates 23 final products tanks ranging in size from 10,000-Gallon to 1,500-Gallon in the TS-1 and Product Tank systems at Allworth. The final products at Allworth are the solvents and chemicals that are distilled for reuse and stored in the facility's storage tanks prior to shipment to back to the original customers; the sludge is distilled for use in cement kilns as an alternate fuel. The remainder of the waste streams distilled by Allworth are recycled for a solvent cleaner that Allworth sells. If the waste stream cannot be recycled, it is sent for disposal. During the inspection the facility was in the process of removing 9 tanks (from TS-1 and the Product tank farm) that were previously permitted under 4-07-0018-0001-01, therefore only 14 tanks now remain subject to this permit.

II. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	EPA Region 4 (R4) inspectors arrived at the facility on March 7, 2023, at approximately 9:00 am.

Activity	Yes No NA	Comments
2. Credentials presented to facility personnel (include name and title).	Y	All inspectors presented their credentials to Bryan Jones, Director, EHS for Clean Earth. Inc.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	Inspectors held an opening meeting with Bryan Jones to discuss the purpose and objectives of the inspection. Terry Thompson, the Facility Manager also joined the discussion.
4. Discussed safety issues.	Y	Inspectors discussed facility-specific safety and emergency procedures and appropriate protective equipment.
5. Discussed which records to be reviewed.	N	The inspection team requested the following records: Number of tanks and the size Emissions Calculations Leak Detection Records
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	Inspectors were primarily interested in inspection of the tanks.
7. Discussed facility policy regarding photographs or video (if applicable).	Y	Region 4 inspectors indicated an Optical Gas Imaging camera would be used during the inspection. The team discussed facility policy regarding videography. Inspectors indicated that copies of any videos taken at the facility would be sent to the company. A log of photographs and videos taken at the facility is included in this report. See Appendix A.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	TVA/PID were not used during the inspection.

Activity	Yes No NA	Comments
9. Discussed CBI.	Y	EPA inspectors indicated that any material claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		
10. The types of records reviewed, and the time period reviewed.	N	2022 Year End Emissions Summary Disposal Manifests for 9/3/2021 and 11/15/2021. 2022 Calendar year Spill Records 2022 Leak Records for 2022
Facility Walk-Through Observations		
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	

Activity	Yes No NA	Comments
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	Y	The infrared camera was used to observe the tanks. No emissions were observed from the tanks or ductwork.
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N	
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	

Activity	Yes No NA	Comments
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	Y	The infrared camera videos and the video log are attached.
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	EPA R4 inspectors did not use a TVA at the facility.

Activity	Yes No NA	Comments
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	EPA R4 inspectors did not use a PID at the facility.
Closing Meeting		
28. Conducted a closing meeting.	Y	EPA Region 4 inspectors conducted a closing meeting on March 7, 2023, at approximately 11:50 am.
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	N/A	
31. Discussed observations.	Y	Inspectors thanked facility personnel for their time and summarized inspection activities.
32. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe.
33. Date and time inspection concluded.		The inspection concluded on March 7, 2023, at approximately 12:30 p.m.

Activity	Yes No NA	Comments
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	While the inspectors were at the facility, Allworth was removing 10 storage tanks from the TS-1 Tank Systems that were not in use. The crane was physically on site and one tank was removed from the property before the inspectors left.

EPA Investigator/Inspector Signature: ROSALYN HUGHES FAIRLEY  Digitally signed by ROSALYN HUGHES FAIRLEY
Date: 2023.05.10 07:59:44 -04'00'

EPA Supervisor Signature & Title: _____

Groendyke, Todd  Digitally signed by Groendyke, Todd
Date: 2023.05.10 08:44:50 -04'00'

Date Report Finalized: _____

APPENDICES AND ATTACHMENTS

1. Appendix A. Inspection Photograph log

Appendix A: Inspection Video Log

During the March 7, 2023, inspection, EPA Region 4 staff used an infrared camera at the facility. Below is a list and description of the videos taken during the inspection.

Table 1: Videos taken during the March 7, 2023, inspection

File Number	Media Description
MOV_1178	TS2system F tanks
MOV_1179	Top of TS2system F tanks
MOV_1181	TS1 System tank area
MOV_1182	Tank being removed from Product tank farm