Inspection Entry Date/Time	05/14/2024 08:28 AM (CT)	Announced: No
Inspection Exit Date/Time	05/14/2024 05:30 PM (CT)	Access: Granted
Regulatory Program	Resource Conservation and Recovery Act (RCRA)	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Facility or Site Name	Safety-Kleen Systems Inc.	
Facility/Site Identifier	NED053316535	
Facility/Site Physical Address	2700 W. Second Street	
City, State, Zip Code	Grand Island, NE 68803	
Generator Status	Large Quantity Generator (LQG); Permitted Treatment, Storage, and Disposal Facility (TSDF)	
NAICS	562112, 484220, 532490, and 484230	
Type of Operation	Chemical distribution, hazardous waste storage, and transfer	
Geographic Coordinates	40.913022, -98.368747	
Permit Number (If Applicable)	NED053316535	

Lead Inspector:			
Amy Thompson	AMY THOMPSON [Signature] Digitally signed by AMY THOMPSON Date: 2024.06.17 10:52:03 -05'00'		*[Date]*
	EPA REGION 7	Thompson.Amy@epa.gov	
Supervisor Review:			
Amber Whisnant	Whisnant, Amber [Signature] Digitally signed by Whisnant, Amber Date: 2024.06.21 18:37:38 -05'00'		*[Date]*
	EPA REGION 7	whisnant.amber@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: CEI

EPA REGION 7 Lead Inspector, Amy Thompson, arrived at the Safety-Kleen Systems Inc. Facility (the "Site" or "Facility"), located at 2700 W. Second Street, Grand Island, NE 68803, at 08:28 AM (CT) on 05/14/2024, for an unannounced inspection. EPA REGION 7 Lead Inspector presented credentials to and informed Kelly Hooper and Korbin Drage that this was a EPA REGION 7 inspection to determine compliance with RCRA. This report is based on information supplied by Safety-Kleen Systems Inc. Facility representatives, observations made by the EPA REGION 7 inspector, and records and reports maintained by the facility and its HQ including, but not limited to: direct observations made by the EPA REGION 7 Inspector(s), photographs taken by EPA REGION 7 inspector(s), physical evidence collected by the EPA REGION 7 inspector(s), measurements or samples taken by EPA REGION 7 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA REGION 7 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report. At the request of the Enforcement Compliance and Assurance Division, I conducted a RCRA unannounced compliance evaluation inspection (CEI) at Safety-Kleen Systems Inc. (the “Site” or “Facility”), located at 2700 W. Second Street, Grand Island, Nebraska 68803, at 8:28 AM (CT) on 5/14/2024. I presented credentials to and informed Kelly Hooper and Korbin Drage that this was an EPA Region 7 inspection to determine compliance with the RCRA. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI. In addition, information gathered prior or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report. The CEI consisted of a discussion of facility operations, waste generation, and waste management; a review of waste management records; and a visual inspection of waste generation and management areas. Document photocopies and photographs were collected as inspection documentation (Appendices 1 and 2). A total of 14 photographs were collected and a photolog was prepared a (Appendix 1). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently. Any authorized Federal regulatory citations noted in this report are adopted by reference in the authorized Nebraska regulations. A drive-by of the facility was conducted prior to entering the building. No areas of concern were noted. I entered the building's office and introduced myself as an EPA inspector to conduct a RCRA compliance inspection to Kelly Hooper, District Administrator, and requested to see Howard Williams who is listed as the site contact. Ms. Hooper stated that Mr. Williams was on vacation and would not be available for the inspection. Ms. Hooper asked if it was possible for the inspection to be conducted at a later time. I told Ms. Hooper that would not be possible and asked if there was someone present who could accompany myself, Trevor Urban, and Mark Henning during the inspection. Ms. Hooper stated that she would find the Warehouse Manager, Korbin Drage, to accompany us during the inspection. Ms. Hooper also contacted the Regional Senior Compliance Manager, James Anderson, to participate in the opening conference via telephone. I provided my credentials to them and discussed the general procedures of the inspection. The facility was last inspected for RCRA compliance on 10/18/2022, by the Nebraska Department of Environment and Energy (NDEE). The following violations were cited during the 2022 NDEE inspection: 1. 40 CFR 262.34(c)(1) Failure to mark hazardous waste container with an accumulation start date within three days of exceeding 55-gallons of satellite accumulation and 2. 40 CFR 264.193(e)(1)(iv) Cracks in hazardous waste secondary containment. Finding 40 CFR 264.193(e)(1)(iv) was repeated on this inspection.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 7	Amy Thompson	(913) 551-7384	Thompson.Amy@epa.gov	Yes	Yes
Inspector/EPA Region 7	Trevor Urban	(913) 551-7133	Urban.trevor@epa.gov	Yes	Yes
District Administrator/Safety-Kleen Inc.	Kelly Hooper	(308) 379-9434	kelly.hooper@safety-kleen.com	Yes	Yes
Warehouse Manager/Safety-Kleen Inc.	Korbin Drage	(308) 850-8142	drage.korbin@safety-kleen.com	Yes	Yes
Regional Senior Compliance Manager/Safety-Kleen Inc.	James Anderson	(316) 708-0971	james.anderson@safety-kleen.com	Yes	Yes

Vice President of Environmental Compliance/Safety-Kleen Inc.	Mori Sorenson		mori.sorenson@safety-kleen.com	No	Yes
Environmental Specialist II/NDEE	Mark Henning			Yes	Yes
Senior Environmental Manager/Safety-Kleen Inc.	Michelle Chilson (via phone during inspection)	(224) 339-4158		No	No
Branch General Manager/Safety-Kleen Inc.	Howard Williams (consulted via phone during inspection)	(308) 375-7910	HOWARD.WILLIAMS@SAFETY-KLEEN.COM	No	No

Opening Conference

I explained the purpose and procedures of the inspection and presented Ms. Hooper, Mr. Drage, and Mr. Anderson with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented a copy of Title 18 U.S. Code, Sections 1001 and 1002 regarding false statements and documents. I discussed their confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim, if desired.

I asked Mr. Drage and Ms. Hooper to review the Hazardous Waste Site Info Verification Report (Appendix 2-attachment 2), which I provided during the inspection. Ms. Hooper indicated that there were no changes to be made to the Hazardous Waste Site Info Verification Report. According to the Hazardous Waste Site Info Verification Report, Safety-Kleen Systems Inc. operates as a permitted TSDF, a LQG of characteristic and listed hazardous wastes, a hazardous waste and used oil transporter, and transfer facility. Based on my review of their monthly hazardous waste generation rate and uniform hazardous waste manifest data, Safety-Kleen Systems Inc. generates greater than 2,200 pounds of hazardous waste per month and is therefore operating as an LQG. Additionally, Safety-Kleen has a Hazardous Waste Management Facility Permit through the state of Nebraska, effective October 7th, 2022, in accordance with 40 CFR Parts 124 and 260 through 270. See the Process Description Section for discussion of their monthly hazardous waste generation.

Facility/Site Information

Number of employees	8
Length of Facility at Location	Since 1992, wholly owned subsidiary of Clean Harbors
Operating Hours	7:30-5:30 M-F
Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	LQG

What type of generator facility verified as?	LQG
Weather Conditions	Day 1 – Sunny

Process Description

Safety-Kleen Inc., a wholly owned subsidiary of Clean Harbors Inc., is located in Grand Island, Nebraska, in an area zoned for commercial use. Safety-Kleen offers an array of environmental services and complementary products to a range of customers including automobile repair shops, car and truck dealers, metal fabricators, machine manufacturers, fleet maintenance shops and other automotive, industrial, and retail customers. Safety-Kleen business offers a line of specially designed parts washers to customer locations and then delivers recurring service that includes machine cleaning and maintenance and the disposal of the spent solvent. Safety-Kleen picks up and transports hazardous and non-hazardous containerized waste for recycling or disposal, primarily through Clean Harbors' network of recycling and waste treatment and disposal facilities. Safety-Kleen collects used oil which serves as feedstock for oil re-refineries. Safety-Kleen markets and sells the re-refined oil.

At the Grand Island facility, the core activities include distribution of parts washer machinery and degreasing solvents and washes, paint solvents, collection of spent parts washer solvent and washes, used oil collection, and containerized waste services (photographic wastes, spent paint solvents and paint wastes, dry cleaning wastes, and spent carburetor cleaners). The Grand Island facility operates a less than 10-day transfer facility for containerized hazardous waste and a permitted hazardous waste storage area.

The site has one building that contains offices and a warehouse area. The warehouse includes a product/inventory storage area, a 10-day hazardous waste transfer area, and a hazardous waste satellite accumulation area. The site has one tank farm east of the main building containing one 12,000-gallon hazardous waste storage tank, one 20,000-gallon clean parts washer solvent tank, two 20,000-gallon used oil tanks and one 20,000-gallon oily water tank. Directly west of the tank farm is the solvent return and fill station. There is one used oil railroad tank car along the southeast side of the main building. Empty containers are stored on the west side of the main building. The facility is surrounded by security fencing with locked access gates. Refer to Appendix 2-attachment 1 for a site map.

Safety-Kleen Inc. generates hazardous wastes which are annually recharacterized in accordance with a waste analysis plan in the RCRA Permit. The annual recharacterization completed each year is used as the basis for the hazardous waste codes used in the following year. I reviewed the hazardous waste recharacterization report for 2023. A waste generation report, including waste codes for each waste stream, off-site management, and total quantities of waste generated for the facility in 2023 and outbound waste shipments in 2024 is included in Appendix 2-attachments 3 and 4. Ms. Hooper and Mr. Drage indicated that hazardous waste stream generation rates and codes were similar from 2023 to 2024.

Wastes are recharacterized annually, per the facility's Waste Analysis Plan. Safety-Kleen generates the following wastes (Refer to Appendix 2-attachments 3 and 4):

Spent Solvent: Spent solvent is collected from customers. The containers full of spent solvent are emptied into a dumpster at the return-and-fill station. The dumpster is piped to the spent solvent waste tank, where the spent solvent is stored on site.

Branch Debris: Absorbents, rags, and personal protective equipment are contaminated with spent solvent during customer pickups and on-site waste management. Mud trap waste collected in the secondary containment grates in the warehouse is also managed as branch debris.

Dumpster Sludge: Solvent-contaminated solids, referred to as “dumpster sludge” are captured in the dumpster used for and shoveled out into a satellite container at the return-and-fill station once every 90-days according to the permit.

Tank Cleanout Sludge: Cleanouts of the sediment in the spent solvent tank occur on an as-needed basis.

Used Oil Retain Samples: Used oil samples are collected from customers. The samples are kept for a minimum of 90 days. After 90 days the samples are managed as hazardous waste generated by the facility. The samples are managed as hazardous waste because the small containers of used oil cannot be reclaimed.

Aqueous Parts Washer Solution: Aqueous-parts washer solution is collected from customers. Each container is given an initial inspection using a Gastec GV-100S machine, which tests the vapors, to determine if the solution may be hazardous. Then the aqueous-parts washer solution is bulked at the facility. The bulked containers are tested prior to shipment for final disposal. Mr. Drage stated that the analytical results very rarely indicate that the aqueous parts washer solution is RCRA hazardous. This occurred once in 2023. The aqueous parts washer solution is stored in the warehouse area in 275-gallon poly composite totes as a non-hazardous waste unless determined otherwise.

Universal Waste: Safety-Kleen is a small quantity handler of universal waste and universal waste transporter. Safety-Kleen collects universal waste from customer facilities, transports and stores the universal waste at the Grand Island facility and ships the waste to a destination facility. During the visual inspection, I observed one container of universal waste lamps in the warehouse area. The container was in good condition, closed, and labeled. Universal waste lamps are sent to Clean Harbors Clive LLC in Clive, UT for recycling. I observed no findings related to the management of universal waste.

Used Oil: Safety-Kleen collects used oil and oily wastewater from customer facilities in a tanker truck. Safety-Kleen off-loads the used oil into a railroad tank car at the Grand Island facility. If no railroad tank cars are available, the used oil is off-loaded into above ground used oil tanks. When a railroad tank car is available again for loading, the used oil in the 20,000-gallon tanks is transferred via truck to an available railroad tank car. Safety-Kleen ships the filled railroad tank cars to the Safety-Kleen re-refinery located in East Chicago, Indiana.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Main Building		No
Office Area		No
Warehouse Area		No
Outside		**Yes**
Railroad		No
Return-and-Fill Station		**Yes**
Tank Farm		**Yes**

SECTION II – OBSERVATIONS

Building: Main Building/Warehouse Area			
Observation #: AT4-OB-001	**Date:** 05/14/2024	**Contains AOC:** No	**Contains CBI:** No
Person Interviewed: Korbin Drage		**Title:** Warehouse Manager	

The warehouse area contained storage for product, the 10-day transfer area, hazardous waste storage, and three hazardous waste satellite containers. Mr. Drage stated that he inspected all containers of waste in the warehouse, including hazardous waste satellite containers, daily. The product inventory is inspected monthly.

Photo(s)

1. IMG-2024051409481948192262376.jpg

Building: Outside/Tank Farm			
Observation #: AT4-OB-002	**Date:** 05/14/2024	**Contains AOC:** Yes	**Contains CBI:** No
Person Interviewed: Mori Sorenson		**Title:** Vice President of Environmental Compliance	

In the tank farm secondary containment, I observed five cracks: one south of the used oil tank, one beneath the fill pipes south of the hazardous waste tank, one by the solvent tank, and two along the north end of the tank farm. Mr. Sorenson stated that he was aware of the presence of the cracks. He stated that the facility had hired a contractor in August 2023 prior to reseal the secondary containment area with epoxy and that the cracks had formed a few months after.

Notice of Preliminary Findings (NOPF) 2: Permit Section E.3. Secondary Containment – Failure to maintain the secondary containment system in accordance with 40 CFR 264.193.

Photo(s)

1. IMG-2024051410452845281511947.jpg
2. IMG-202405141046044641330657.jpg
3. IMG-2024051410461146111494506.jpg
4. IMG-2024051410483248321732939.jpg
5. IMG-2024051410484248421701882.jpg

Building: Outside/Tank Farm			
Observation #: AT4-OB-003	**Date:** 05/14/2024	**Contains AOC:** No	**Contains CBI:** No
Person Interviewed: Korbin Drage		**Title:** Warehouse Manager	

Along the east side of the tank farm, north of the solvent fill area, I observed an area of stained concrete and a dark pooling liquid next to the tubing used to transfer used oil in and out of the used oil tank. I asked Mr. Drage about the spill and the staining. Mr. Drage stated that the spill was not present the day prior when he conducted his daily inspection of the area. Mr. Drage stated that he was confident the liquid was used oil because the only activity that occurred at the tank farm that morning was used oil was transferred from a truck to the used oil tank. The area of stained concrete was much larger than the pool of used oil, indicating that spills of used oil occurred more than once in that area. Mr. Drage, Mr. Urban, and I agreed that the spill had likely occurred after the used oil is removed or added to the used oil tank and the tube is dropped on the ground, allowing residual used oil to spill onto the concrete. Mr. Urban and I discussed best management practices in the area with Mr. Drage. I observed Mr. Drage using diatomaceous earth to clean the spill immediately after we discussed the issue. The pooled liquid and the staining did not extend beyond the concrete onto the ground. Therefore, I did not note the observation as a finding.

Photo(s)

1. IMG-202405141052015212173135.jpg
2. IMG-202405141100310311964387.jpg

Building: Outside/Tank Farm			
Observation #: AT4-OB-004	**Date:** 05/14/2024	**Contains AOC:** No	**Contains CBI:** No
Person Interviewed: Korbin Drage		**Title:** Warehouse Manager	

The hazardous waste facility management permit requires a spill kit near the tank farm where Mr. Drage used diatomaceous earth to clean a spill of used oil near the tank farm during the inspection. The spill kit did not contain diatomaceous earth and Mr. Drage retrieved the diatomaceous earth from the spill kit near the used oil railroad tank car to clean the spill. The spill kit located at the tank farm did contain absorbent pads and several other items that would have been adequate to clean the spill, as a result the observation was not noted as a finding. However, I told Mr. Drage to ensure that the spill kit contained the materials that the facility staff would actually use to clean a spill.

Building: Main Building/Warehouse Area			
Observation #: AT4-OB-005	**Date:** 05/14/2024	**Contains AOC:** No	**Contains CBI:** No
Person Interviewed:		**Title:**	

I asked Mr. Drage how he ensured that incompatible wastes were stored separately in the 10-day transfer area. Mr. Drage stated that when waste arrived at the facility, he referenced a DOT incompatibles chart to ensure that incompatible wastes were stored appropriately. The facility added this practice to the standard operating procedures after inappropriate incompatibles storage was noted as a finding during a previous inspection.

Building: Main Building/Warehouse Area			
Observation #: AT4-OB-006	**Date:** 05/14/2024	**Contains AOC:** No	**Contains CBI:** No
Person Interviewed:		**Title:**	

In the warehouse, there were three containers of facility generated hazardous waste managed in the same satellite accumulation area, totaling more than 55-gallons:

- One 55-gallon container ½ full of branch debris, closed, marked with the words “hazardous waste”, in good condition, and dated 4/17/2023.
- One 15-gallon container ¼ full of waste aerosol cans, closed, marked with the words “hazardous waste”, in good condition, and dated 4/1/24.
- One 55-gallon container ½ full of used oil retain samples closed, marked with the words “hazardous waste”, in good condition, and dated 5/8/24.

Mr. Drage stated that he considered the containers to be hazardous waste satellite containers. I told Mr. Drage that because all of the containers were managed in the same hazardous satellite accumulation area and totaled more than 55-gallons, I determined the container to be less than 90 day hazardous waste accumulation containers (hazardous waste storage containers). I asked him why the containers were dated. Mr. Drage explained that the containers were marked with the date that hazardous waste was first placed in the containers and the date the containers became full. Mr. Drage stated that the containers are shipped with the 10-day transfer waste within 90 days, whether the containers were full or not. I asked Mr. Drage if he inspected the containers. Mr. Drage stated that he inspected the containers as part of his daily inspection of the warehouse. I reviewed the inspection records of this area and inspections appeared to be adequate. All of the containers met the requirements as hazardous waste storage containers. As a result, I did not note any findings. I explained the requirements for hazardous waste storage and satellite containers. Mr. Drage stated he understood and would manage the containers in different areas of the warehouse moving forward.

Photo(s)

1. IMG-202405141006436431970021.jpg
2. IMG-202405141006546542109670.jpg
3. IMG-20240514100704742087480.jpg

Building: Outside/Railroad			
Observation #: AT4-OB-007	**Date:** 05/14/2024	**Contains AOC:** No	**Contains CBI:** No
Person Interviewed: Korbin Drage		**Title:** Warehouse Manager	

There was a containment structure full of storm water beneath the used oil railroad tank car. Mr. Urban asked Mr. Drage how often water was removed from the containment. Mr. Drage stated he did not know. Mr. Urban noted the potential problems that could arise if the containment structure was not maintained and therefore unable to perform its intended function.

Building: Outside/Return-and-Fill Station			
Observation #: AT4-OB-008	**Date:** 05/14/2024	**Contains AOC:** Yes	**Contains CBI:** No
Person Interviewed: Korbin Drage		**Title:** Warehouse Manager	

I observed an area of stained concrete along the southwest side of the return-and-fill station shed and on the metal rim of the containment structure underneath the station. The staining on the metal rim of the containment structure was directly below the section of the return-and-fill station where containers full of used solvent are emptied into the solvent dumpster. The staining was consistent with the appearance of used solvent. It was evident that solvent from the station had collected below the grates where solvent from customers is emptied into the solvent dumpster. The solvent had then flowed over the edges of the containment, causing a release. I asked Mr. Drage how long the stains had been present. Mr. Drage was uncertain how long the stains had been present. Mr. Drage stated that the area beneath the grates at the return-and-and fill station dumpster had been cleaned out the month prior to the inspection, but he was unsure how often the area was normally cleaned out.

NOPF 1: Permit Section C.1. Design and Operation of Facility - Failure to minimize the possibility of a release of hazardous waste constituents.

Photo(s)

1. IMG-2024051410392339232634071.jpg
2. IMG-2024051410423242321806009.jpg
3. IMG-202405141043004301710010.jpg

SECTION III – RECORDS REVIEW

Record: Inspections **AOC:** No

Ref #: AT4-RR-001 **Reviewed By:** Amy Thompson **Reviewed Date:** 05/14/2024

Safety-Kleen conducts inspections of the facility in accordance with an inspection schedule in the RCRA permit. The inspections are electronically recorded and uploaded to the Clean Harbors inspection system for storage and retrieval. These inspections included: daily inspections of the container storage area, storage tanks, and return-and-fill station; weekly inspections of safety equipment and security (fence and gates); annual Subpart BB & CC inspections of the tank and fire extinguishers; and inspections every 5-years of the tank alarm calibration and tank thickness. I requested documentation of inspections required in the permit for the period since the previous inspection (10/19/2022-5/14/2024). I reviewed approximately 10 inspection record dates at random including weekends and holidays for all daily and weekly inspections. I did not note any areas of concern.

Record: Contingency Plan **AOC:** No

Ref #: AT4-RR-002 **Reviewed By:** Amy Thompson **Reviewed Date:** 05/14/2024

I reviewed the contingency plan and observed that Ms. Hooper was listed as the alternative emergency coordinator. Ms. Hooper confirmed that she was the alternative emergency coordinator and the contingency plan was up-to-date. I observed no apparent issues or findings related to my review of the contingency plan. See Appendix 2-attachment 6.

Record: Manifests **AOC:** No

Ref #: AT4-RR-003 **Reviewed By:** Amy Thompson **Reviewed Date:** 05/14/2024

I discussed uniform hazardous waste manifest recordkeeping with Mr. Sorenson and Ms. Hooper. Safety-Kleen maintains copies of hazardous waste manifests on site. These include manifests where Safety-Kleen is the generator, designated treatment, storage, and disposal facility (TSDF), or transporter. I observed no areas of concern.

Record: Personnel Training **AOC:** Yes

Ref #: AT4-RR-004 **Reviewed By:** Amy Thompson **Reviewed Date:** 05/14/2024

I reviewed annual RCRA training records for 2023 and 2024 for all employees at the facility. I observed that Kelly Hooper's hazardous waste training for 2023 was listed as "inactive." Kelly Hooper was listed as the alternative emergency coordinator in the facility's contingency plan and as a result requires annual hazardous waste training. Ms. Hooper stated that she thought she was no longer required to take hazardous waste training since she had transitioned to working remotely in April 2023. Ms. Hooper last received hazardous waste training on December 19, 2022. I explained to Ms. Hooper that since she was listed as an alternative emergency coordinator, she was required to have annual hazardous waste training. During the exit briefing, I explained to facility representatives that the facility could remove Ms. Hooper as an alternative emergency coordinator and update the contingency plan or that Ms. Hooper could resume annual hazardous waste training. See Appendix 2-attachment 5)

NOPF 3: Title 128, Chapter 19, 003 - Failure to maintain 2023 hazardous waste training for Kelly Hooper, the alternative emergency coordinator.

SECTION IV – AREAS OF CONCERN

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

Building: Outside	**Area:** Tank Farm	**Sub-area:**
AT4-OB-002		
NOPF 2: Permit Section E.3. Secondary Containment - Failure to maintain the secondary containment system in accordance with 40 CFR 264.193		
Building: Outside	**Area:** Return-and-Fill Station	**Sub-area:**
AT4-OB-010		
NOPF 1: Permit Section C.1. Design and Operation of Facility - Failure to minimize the possibility of a release of hazardous waste constituents.		
Record: Personnel Training		
AT4-RR-004		
NOPF 3: Title 128, Chapter 19, 003 - Failure to maintain 2023 hazardous waste training for Kelly Hooper, the alternative emergency coordinator.		

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

I summarized my findings and recommendations with Mr. Drage, Ms. Hooper, Mr. Anderson, and Mr. Sorenson. I provided Mr. Sorenson with a *Confidentiality Notice* which he signed as acknowledgement of receipt (Appendix 2-attachment 9); Mr. Sorenson made no confidentiality claims. I also provided Mr. Sorenson with a *Receipt for Documents and Samples* and a *NOPF*, which Mr. Sorenson signed as acknowledgement of receipt (Appendix 2-attachments 7 and 8).

Follow Up

I observed no follow up at the time of the inspection.

Communication Log

The following information was received by REGION 7 on/after exiting the Facility on 05/14/2024.

Type	Location	Point of Contact	Job Title/Organization	Description	Contains PII	Date
Email		James Anderson	Environmental Compliance Manager/Safety-Kleen Systems Inc.	Response to NOPF	No	05/28/2024 03:07 PM (CT)

Phone		Howard Williams	Branch General Manager/Safety-Kleen Inc.	Clarification on information obtained during the inspection.	No	06/12/2024 11:34 AM (CT)

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log