

RCRA Inspection Report

1) **Inspector and Author of the Report**

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U.S. EPA Region 4
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance
Division 61 Forsyth St. S.W. 10th Floor
Atlanta, Georgia 30303-8960

2) **Facility Information**

Colonial Terminals Inc.
101 North Lathrop Avenue
Savannah, GA 31415
EPA ID Number # GAD006926430

3) **Responsible Official**

Rigel Rodriguez, EHS Director
Colonial Group, Inc.
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Michelle Nooney, Environmental Specialist
Colonial Group Inc.
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Matthew Miller, EHS Specialist
Colonial Group, Inc.
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4) **Inspection Participants**

Michelle Nooney, Colonial Group, Inc.
Matthew Miller, Colonial Group, Inc.
Dillon Long, GAEPD
Raj Aiyar, EPA

5) **Date and Time of Inspection**

August 25, 2021, 9:00 a.m.

6) Applicable Regulations

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, adopts and incorporates by reference 40 CFR Parts 260 - 266, 268, 270, 273 & 279. The Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-60, et seq. as amended (Act), Chapter 391-3-11 of the Georgia Rules for Hazardous Waste Management (Rules), and those portions of 40 CFR Parts 260-270, 273, and 279 that are adopted into the Rules by reference).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

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

7) Purpose of Inspection

The purpose of the inspection was to conduct an announced RCRA compliance evaluation inspection (CEI) due to Covid Pandemic at Colonial Terminals Inc., (hereinafter, “Colonial” or the “facility”) and determine the facility’s compliance status with applicable RCRA regulations.

8) Facility Description

Colonial operates as a shipping and receiving facility; bulk products such as petroleum products, liquid chemicals, kaolin clays, fertilizers and other dry bulk commodities are received from both domestic and international clients. All the liquid and dry commodities brought to Colonial are by tanker truck, rail and vessels. The facility has been in operation since 1934. Colonial currently has three hundred employees. The facility’s hours of operation are 24-hours a day, seven days a week (with three 8-hour shifts). The facility is comprised of three individual and adjacent operations operating under a single RCRA ID Number. Colonial Terminals’ sites function as ocean terminals and bulk storage and distribution operations. Colonial Chemical Solutions functions as bulk to non-bulk operation that repackages, blends, and dilutes both solid and liquid chemical products.

According to facility personnel, the facility undergoes regular inspection by the United States Department of Homeland Security and United States Coast Guard.

Facility Process and Hazardous Waste Generation

The facility generates hazardous waste during tank cleanouts, line flushing, and disposal of off-specification or otherwise unsalable products. All rinsate from tank cleanouts is sent to the appropriate disposal facility. The vast majority of the rinsate from product tank cleanouts are nonhazardous. Hazardous constituents vary depending on the products being handled. If the rinsate is determined to be hazardous, then the waste is drummed and managed as hazardous waste in the central accumulation area (CAA) prior to disposal at a permitted treatment storage and disposal (TSD) facility.

According to facility operators, tanks with the potential to generate hazardous waste during cleanout vary from 500 to 1.2 million gallons. These product tanks are emptied and serviced at least once every ten years depending on the product and their customers. Colonial is currently registered as a large quantity generator (LQG) of hazardous waste. Waste streams listed on the registration include the following: D001 (ignitable), D002 (corrosive), D004 (arsenic), D005 (barium), D007 (chromium), D008 (lead), D009 (mercury), D011 (silver), D018 (benzene), D035 (methyl ethyl ketone), D039 (tetrachloroethylene), D040 (trichloroethylene), D043 (vinyl chloride), F003, F005, U002, U031, U056, U057, U112, U147, U154, U239, F037, F038, K050, K169. The facility also generates universal waste such as spent lamps and batteries.

Colonial uses Univar Solutions USA Inc. (EPA ID Number TXR000084869) as a transporter and Univar Solutions USA Inc. (EPA ID Number NCD061263315) for disposal of hazardous waste.

9) Previous Inspection/Compliance History

The facility was previously inspected by the GAEPD on March 14, 2018. No deficiencies were discovered during that inspection.

10) Findings

Upon arriving at the facility, the inspectors met and presented their credentials to Rigel Rodriguez, EHS Director, Michelle Nooney, Environmental Specialist, and Matthew Miller, EHS Specialist. The inspectors then explained the purpose of the visit. Mr. Miller and Ms. Nooney provided the inspectors a general description of the on-site activities at the facility. The inspectors were later accompanied by Ms. Nooney and Mr. Miller during the walk-through inspection of the facility.

Satellite Accumulation Areas (SAAs) - Truck Stop

The inspectors observed three SAAs in the Truck Stop Area. There were two 55-gallon spent solvent (D001) drums on a spill pallet. One spent solvent drum contained hexane and methanol and the other 55-gallon spent solvent drum contained a mixture of wastewater, xylene and cumene (Picture-1). A third 55-gallon drum (D001) contained an aerosol can puncture device with a filter mounted on the drum (Picture-2). The drained aerosol containers are sent for metals recycling. All the SAA drums were observed to be closed and intact. The SAA drums were observed to be labeled with the words "Hazardous Waste" and an indication of hazards of the contents. There was a signage indicating "Danger" and "No Smoking" in the SAA. There were no leaks or spills observed near the SAA drums.

Colonial Chemical Solutions (SAA)

At the time of the inspection, the inspectors observed one SAA drum in the process area. The SAA drum contained mixed solvents, acetone, and butanol (D001) that was closed and properly labeled with the words “Hazardous Waste” and an indication of the hazards of the contents (Picture-3). There was no leaks or spills observed in the SAA.

The SAA was equipped with a spill kit, fire extinguisher and an eyewash station.

Central Accumulation Areas (CAAs) - Less than 90-day Storage

Colonial Terminal Plant 1

The inspectors observed a sign at the entrance indicating the hazardous waste storage and a “Danger” and “No Smoking” warning sign and a signage for Drum Storage Rules (Picture-4). The inspectors observed two 55-gallon hazardous waste drums containing water, sludge, and gasoline (D001, D018) and one 55-gallon hazardous waste drum of ethanol (D001, D018) generated as tank cleanout in storage at the time of inspection. All the drums were observed to be closed, dated, and labeled with the words “Hazardous Waste”. The hazard indication on the drums were observed to be “Flammable”. The oldest accumulation start date on the drum was observed to be 03/10/2021. There were no leaks or spills observed in the storage area. The CAA was equipped with a fire extinguisher.

Colonial Terminal Plant 2

The storage area in Plant 2 is comprised of an area enclosed by a chain link fence on three sides and access through a locked chain-link gate (Picture-5). The inspectors observed a sign at the entrance indicating the hazardous waste storage and a “Danger” and “No Smoking” warning sign. At the time of the inspection, the CAA contained one 55-gallon drum of kerosene (D001) and water that was closed, dated, and properly labeled with the words “Hazardous Waste” (Picture-6). The hazard indication on the drums were observed to be “Flammable”. The inspectors also observed two 5-gallon jugs of low-pH corrosive waste pending analysis that were closed, dated, and properly labeled. There were no leaks or spills observed in the storage area. The CAA was equipped with a fire extinguisher.

Colonial Chemical Solutions

The inspectors observed a sign at the entrance indicating the hazardous waste storage and a “Danger” and “No Smoking” warning sign. At the time of the inspection, the CAA contained twelve 55-gallon drums of mixed solvents, acetone, and butanol in storage (Picture-7). All the drums were observed to be closed, labeled with the words “Hazardous Waste” and an indication of the hazards of the contents. The oldest accumulation date observed during the inspection was 7/24/21. There were no leaks or spills observed in the storage area.

Universal Waste

Universal waste lamps and batteries are generated during regular facility and equipment maintenance. At the time of the inspection, the Colonial Terminals Plant 2 Warehouse contained:

- One box of 4-foot spent mercury-containing fluorescent lamps
- One box of spent high-intensity discharge (HID) and assorted smaller lamps
- One 3-gallon bucket of spent nickel-cadmium, lithium, and lead-acid batteries

All containers were closed, dated, and properly labeled. The oldest accumulation start date was observed to be 4/15/2021. Universal waste is picked up by Veolia Environmental Services (EPA ID FL0000207449)

Used Oil

Used oil is generated through the regular facility and equipment maintenance. At the time of inspection, the Colonial Terminal Plant 2 Truck Shop contained a one 1,000-gallon tank of used oil that was labeled with the words “Used Oil” and was located within a secondary containment structure (Picture-8). There were no leaks or spills observed in the secondary containment. Used Oil is picked up and disposed by Coastal Refining Corporation (EPA ID GAD038921136).

Records Review

After the walk-through inspection of the facility, the inspectors reviewed the records. The records review included the following:

- Uniform Hazardous Waste Manifests including the Land Disposal Restriction Forms for the last three years
- Contingency Plan along with a copy of the quick reference guide
- Weekly Inspection Logs
- Personnel Training
- Document showing emergency arrangements made with the local authorities.
- 2019 Biennial Report
- 2020 Waste Reduction Plan

11) Out-Briefing

An exit briefing was conducted after the inspection. Based on the observation and records reviewed, the facility was determined to be operating as a Large Quantity Generator of Hazardous Waste and a Small Quantity Handler of Universal Waste. The findings of the inspection were discussed with Mr. Rodriguez, Ms. Nooney, and Mr. Miller, and the inspection was concluded.

12) Signed

RAJAGOPAL AIYAR Digitally signed by RAJAGOPAL AIYAR
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Raj Aiyar
Environmental Engineer

Date

13) Concurrence

**ARACELI
CHAVEZ**

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ARACELI CHAVEZ
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Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A
COLONIAL TERMINALS INC.
SAVANNAH, GA 31415
EPA ID: GAD006926430
RCRA COMPLIANCE EVALUATION INSPECTION
AUGUST 25, 2021

(Photos taken by Dillon Long with GA EPD)



Picture 1: Two SAA Drums (Truck Stop Area, Terminal Plant #2)



Picture 2: One SAA Drum with Aerosol Can Puncture Device and a filter (Truck Stop Area, Terminal Plant #2)





*Picture 7: Central Accumulation Area - 90-day Storage
(Colonial Chemical Solution)*



*Picture 8: 1000 gallon Used Oil Tank with Secondary
Containment (Terminal Plant #2)*