

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N212837366

FACILITY: SAFETY KLEEN SYSTEMS, INC.		SRN / ID: N2128
LOCATION: 2700 MULLINS COURT NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Maggie Tenant, Environmental, Health & Safety Manager		ACTIVITY DATE: 10/20/2016
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, Scheduled Inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) and April Lazzaro (AL) arrived at the facility at approximately 10:15 am on October 20, 2016 to conduct an unannounced inspection. The purpose of this inspection was to determine compliance with applicable air quality rules and regulations.

No odors were observed upon entering the site. AQD staff met with Ms. Edna Hamilton and Mr. Andrew Phelps, representatives of the Safety Kleen Walker office location. Additionally, AQD staff spoke with Ms. Maggie Tenant, the Environmental, Health & Safety Manager, via over the phone / email after the inspection to provide additional records regarding the tanks and drum washing operation on site. AQD staff briefly discussed the purpose of this inspection and a walk through of the site was performed to observe on site operations.

Facility Description

Safety Kleen is a storage facility of waste material that includes mostly petroleum distillates/hydrotreated light and used oils. The site had previously been in operation under three permits (Permit to Install (PTI) No's. 830-89, 830-89A & 489-93), which were voided in 1994 and/or 2009. PTI No. 830-89A was for the drum washing operation, while PTI No. 489-93 was for tanks on site.

Facility Inspection

Four buildings make up the overall layout of the facility which consisted of the administrative building, warehouse building, return and fill building and the rubb building. The majority of the shipping and receiving of waste storage is conducted in the warehouse building. This specific Safety Kleen location operates approximately four box trucks and two oil trucks. The facility at the time of the inspection contained two 15,000 gallon used oil tanks (Tanks C & D), one 15,000 gallon used oil and water tank (Tank B) and one split tank that contained two separate compartments. The split tank consisted of the following separate compartments: one 5,000 gallon used oil tank (Tank A) and one 15,000 gallon tank containing clean/recycled Safety-Kleen Premium Solvent (Tank Clean Solvent). All four tanks were located to the south of the warehouse structure. Ms. Tenant provided via email, vapor pressures of some of the oil products received and the vapor pressure for the Safety-Kleen Premium Solvent. After researching and reviewing the vapor pressures provided by Ms. Tenant for the associated products, it appears the vapor pressures are less than 1.5 psia. Therefore, based on the size of the tanks being <40,000 gallons and the vapor pressure for the associated contents being <1.5 psia, the tanks appear exempt under Rule 284(i).

The drum washing within the return and fill building was located within the central portions of the facility to the southeast of the warehouse structure. The interior portions of the return and fill building contained numerous 55-gallon containers labeled Hazardous Waste, Non Regulated Waste and Continued Use Solvent. According to Ms. Tenant and Mr. Phelps 55-gallon containers containing clean Premium Solvent are shipped to customers to be utilized for parts washing. The waste product is then returned to Safety Kleen and split into dirty or continued use categories depending on the customer's application and characterization method. The contents within the 55-gallon containers are pumped via a stick nozzle and transferred to the 7,000 gallon tanker located within the rubb building. The empty waste drums are then washed with used Premium Solvent and refilled with clean Premium Solvent where they are re-shipped out to customers. Mr. Savago stated that the 7,000 gallon tanker and the contents within are transported off site weekly. Rule 290 exemption records for the drum washing operation were requested from Ms. Tenant and provided along with safety data sheets for the products identified during the inspection by AQD Staff.

During a follow up phone conversation on October 31, 2016, Ms. Tenant stated to AQD staff AS specifically that only waste products CAS# 64742-47-8 & CAS# 127-18-4 were received back from customers for drum washing. After further review of the records provided, the total uncontrolled noncarcinogenic Volatile Organic Compounds (VOCs) emissions per month is below 1,000 lbs and the total emissions per month of tetrachloroethylene is

below 20 lbs per month; therefore, it appears the drum washing is exempt per Rule 290(a)(ii).

AS and AL left the facility at approximately 11:15am. Based on the records reviewed and observations identified during the inspection, Safety Kleen is within compliance.

NAME Adam E. [Signature]

DATE 11/10/2016

SUPERVISOR [Signature]