

EDMC SAFETY & HEALTH, LLC



Industry Waste/Chemical Management and Storage INSPECTION REPORT

Inspection Site:	Washington Ford	Date of Inspection: 1/25/2023
Inspection Site Address:	507 Washington Road, Route 19 Washington, PA 15301	EPA #: PA0000131722
Conducted by:	Stefan DePofi	Phone No.: (412) 922-6844

Please read this report in its entirety, recognizing that each section contains important information concerning the current management of waste, as well as recommendations to improve the future management of waste.

Please pay particular attention to any entry in the report marked as **non-compliant or any comments in red ink** and follow-up with any required remediation efforts.

The Commonwealth's hazardous waste regulations are found in Title 25 of the Pennsylvania Code. *Management or hazardous waste management* is defined as the entire process, or a part thereof, of storage, collection, transportation, processing, treatment and disposal of solid wastes by a company/person engaging in the process. Wastes are categorized as hazardous, regulated or residual.

Wastes that exhibit one or more of the following **TRIC** characteristics are hazardous waste:

Toxic: Waste that is toxic is harmful when taken into the body.

Reactive: Waste that is reactive is unstable or undergoes a rapid, violent chemical reaction when in contact with water or other materials.

Ignitable: Waste that is ignitable includes most liquid waste that has a flash point of less than 140 degrees Fahrenheit, non-liquid waste that can create fire under certain conditions (e.g., temperature, pressure), and waste that is spontaneously combustible. Degreasers and solvents may be ignitable.

Corrosive: Water-based liquid waste is corrosive if it has a pH less than or equal to 2 or greater than or equal to 12.5. This includes liquid waste that corrodes steel at a specified rate. Shop wastes that may be corrosive include acid cleaning fluids, alkaline cleaning fluids, and battery acid.

Primary Requirements for Waste Generators:

- Identify your hazardous waste (40 CFR 262.11).
- Obtain an EPA identification number (25 Pa. Code Chapter 262a.12 and 40 CFR 262.12). Any facility that generates, transports, recycles, treats, stores, or disposes of hazardous waste is required to notify EPA of their hazardous waste activities.
- Accumulate your waste on site according to specified standards (40 CFR 262.34): Using acceptable units and equipment, processes and procedures.

- Preparing for emergencies at your site.
- Ensuring your personnel are knowledgeable of your operations, wastes handled, and emergency response procedures.
- Properly prepare your hazardous waste for shipment offsite (e.g., proper packaging and labeling) (40 CFR 262.30-262.33).
- Prepare, transmit and keep copies of manifests that accompany your offsite shipments (25 Pa. Code Chapter 262a, Subchapter B and 40 CFR Part 262 Subpart B).
- Keep records of your hazardous waste activities and submit reports to DEP, as specified (25 Pa. Code Chapter 262a, Subchapter D and 40 CFR Part 262, Subpart D).

The following are typical wastes that are classified as hazardous or regulated. Wastes generated by your organization are identified below:

- | | |
|-------------------------------------------------------------------|------------------------------------------------------------|
| <input checked="" type="checkbox"/> Waste Oil | <input type="checkbox"/> Waste Gasoline |
| <input checked="" type="checkbox"/> Used Oil Filters | <input checked="" type="checkbox"/> Parts Washer (Solvent) |
| <input checked="" type="checkbox"/> Portable Waste Oil Drain Tank | <input checked="" type="checkbox"/> Shop Rags |
| <input checked="" type="checkbox"/> Used Anti-Freeze | <input type="checkbox"/> Paint Related Wastes (Solvents) |
| <input checked="" type="checkbox"/> Battery Cores | <input type="checkbox"/> Paint Related Wastes (Waterborne) |
| <input checked="" type="checkbox"/> Scrap Tires | <input type="checkbox"/> Paint Booth Filters |

Satellite Storage: You may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near the point of generation where wastes initially accumulate and is supervised by whoever generates the hazardous waste. If you exceed the 55 gallon limit at the satellite accumulation area, you must remove the excess amount within three days of exceeding the limit, and transfer the excess amount of waste to an Accumulation Area.

Accumulation Area: LQGs and SQGs have up to 90 or 180 days, respectively, to ship their hazardous waste from the accumulation area to a Treatment Storage and/or Disposal Facility (TSDF).

A generator class is an EPA designation that is based on the amount of hazardous waste your shop generates in one month. Your generator class could change from month to month. The three classifications are:

1. Conditionally-Exempt Small Quantity Generators (CESQG) = less than 220 lbs/month
2. Small Quantity Generators (SQG) = between 220 lbs/month and 2,200 lbs/month
3. Large Quantity Generators (LQG) = greater than 2,200 lbs/month

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Based on my inspection on the above date, you are a Small Quantity Generator (SQG). SQG's have up to 180 days to ship their hazardous waste from the accumulation area to a Treatment Storage and/or Disposal Facility.

Any facility that generates, transports, recycles, treats, stores, or disposes of hazardous waste is required to notify EPA of their hazardous waste activities.

The following are the findings of my inspection. Please read the report in its entirety, realizing that each section contains important information concerning the current management of waste, as well as recommendations.

	Waste Oil <i>Regulated Waste</i>	Used Oil Filters <i>Residual Waste</i>	Portable Waste Oil Drain Tank <i>Regulated Waste</i>
Compliance	Compliant	Compliant	Compliant
Location of Waste	1. Service Dept. 2. Prep Center	1. Outside of Ford Service Dept. 2. Outside of Prep Center	1. Service Dept. 2. Prep Center
Container Size	1. (1) 520 Gal. 2. (2) 250 Gal.	N/A	N/A
Container Type	1. Metal Tank 2. Metal Tanks	1. Metal Bin 2. Metal Bin	1. Plastic Containers 2. Metal Containers
Container Condition	1. Good 2. Good	1. Good 2. Good	1. Good 2. Good
Container Labeled As	1. Waste Oil 2. Waste Oil	1. Drained Used Oil Filters Only 2. Drained Used Oil Filters Only	1. Oil King 2. Waste Oil
Accumulation Start Date	N/A	N/A	N/A
Closed to Atmosphere	1. Yes 2. Yes	1. Yes 2. Yes	N/A
Container Grounded	N/A	N/A	N/A
Waste Removed By	Ernies Waste Oil	Safety Kleen	See "Used Oil"
On File -- Manifest/Receipt Date	1/20/2023	11/1/2022	See "Used Oil"
Comments			
Picture Attachments			

The following are the findings of my inspection. Please read the report in its entirety, realizing that each section contains important information concerning the current management of waste, as well as recommendations.

	Used Anti-Freeze <i>Regulated Waste</i>	Battery Cores <i>Regulated Waste</i>	Scrap Tires <i>Regulated Waste</i>
Compliance	Non-Compliant	Compliant	Compliant
Location of Waste	Service Dept.	Parts Dept.	Outside Service Dept.
Container Size/ Number of Items Stored	N/A	5	30
Container Type	Metal Drum	Plastic Bin	N/A
Container Condition	Good	Good	N/A
Container Labeled As	Used Anti-Freeze	Danger – Corrosive Material	N/A
Accumulation Start Date	N/A	N/A	N/A
Closed to Atmosphere	No	N/A	N/A
Container Grounded	N/A	N/A	N/A
Waste Removed By	Ernies Waste Oil	ADW	Liberty Tire
On File -- Manifest/Receipt Date	8/29/2022	1/25/2023	1/14/2023
Comments			
Picture Attachments	See Pages 13		

The following are the findings of my inspection. Please read the report in its entirety, realizing that each section contains important information concerning the current management of waste, as well as recommendations.

	Waste Gasoline <i>Hazardous Waste</i>	Parts Washer (Solvents)	Shop Rags <i>Potential Hazardous Waste</i>
Compliance	N/A	Non-Compliant	Non-Compliant
Location of Waste		Service Dept.	1. Service Department 2. Prep Center
Container Size		(2) Parts Washers	N/A
Container Type		N/A	1. (2) Metal Containers 2. Metal Container
Container Condition		1. Good 2. Good	1. Good 2. Good 3. Good
Container Labeled As		1. Parts Washer 2. Parts Washer	1. Empty Every Night 2. Not Labeled 3. Oily Waste Can
Accumulation Start Date		N/A	N/A
Closed to Atmosphere		1. No 2. Yes	1. Yes 2. No 3. Yes
Container Grounded		N/A	N/A
Waste Removed By		Safety Kleen	Uni-First
On File -- Manifest/Receipt Date		Information was unavailable at the time of inspection	1/25/2023
Comments			Waste containers must be labeled to identify its contents.
Picture Attachments		See Pages 14	See Pages 15 & 16

Aerosol Cans (Waste Management Information) <i>Potential Hazardous Waste</i>	Absorbents (Waste Management Information) <i>Potential Hazardous Waste</i>
<p>Any aerosol can that is pressurized and not punctured <u>may be considered hazardous waste</u>. It is a best practice to use all the contents of an aerosol can. Do not throw full, partially-full or pressurized spray cans into the dumpster.</p> <p>Examine the contents of the can and figure out if any of the chemicals in the can are toxic, reactive, corrosive, or ignitable to see if the waste in the can is hazardous waste. Certain aerosol brake cleaners and carburetor cleaners can be hazardous waste.</p> <p>If it is hazardous waste, place full, partially-full, or pressurized empty aerosol cans in a closed container, such as a drum or five gallon pail, and send to a permitted hazardous waste facility. Label and date the container with the date that you started storing cans in it.</p> <p>You can depressurize and drain your hazardous waste aerosol cans. Use an aerosol can puncturing device to safely drain the contents of the can into a hazardous waste container. Once your steel aerosol can is completely empty and depressurized you may send the can to a scrap metal recycling facility.</p> <p>To avoid cross-contamination of other wastes, do not use spray cans over solvent containers, parts washers, used oil containers, or any other waste containers.</p> <p>If your hazardous waste spray can malfunctions (for example, if the tip breaks off), send the can to a permitted hazardous waste handler or consider returning it to your supplier.</p>	<p>Absorbents (such as sand or kitty litter) used to clean up oil spills can be placed in the trash if there is no free flowing oil in them and if the spilled oil is not hazardous waste. If they are used to clean up fuel or other spills, the absorbents may be hazardous waste depending on the nature of the fuel or material spilled. Determine the makeup of the materials in your shop to determine if the fuel or material exhibits the TRIC characteristics or would be a listed hazardous waste.</p> <p>It is important to identify all of the hazardous wastes in your shop so, among other things; you know how to clean up a potential spill safely. If the spilled material contains hazardous waste then count the used absorbents in determining your generator class and manage the material as a hazardous waste.</p>

What to do with Shop Waste

Type of waste	Category of waste if not mixed with hazardous wastes	What you can do with it
Used oil	Used oil	Recycle or burn
Shop rags used to only clean up used oil	Used oil if they are dripping with used oil	Wring any dripping oil out of the rag into a used oil container. Either launder the rags at an industrial facility or burn them in your shop for heat.
Shop rags used to clean up solvents that are hazardous waste	Hazardous waste	Wring any dripping solvent out of the rag into a hazardous waste container. Launder the rags at an industrial laundry or ship them to a hazardous waste facility.
Shop rags used to clean up solvents that are not hazardous waste	Solid waste	Wring any dripping solvent out of the rag into a waste solvent container. Launder the rags at an industrial facility.
Used oil filters	Not categorized	Hot drain any used oil into a used oil container. Recycle or dispose in trash. If they are not drained, then they are classified as used oil and you should send the filters to a used oil recycler.
Used fuel filters	Many are hazardous waste. Some may not be.	Drain the fuel filter into a container. Reuse the fuel if possible. Manage the filter as hazardous waste unless you can determine that the filter is not hazardous waste.
Oil spill absorbent material	Used oil or solid waste	If the absorbent material is dripping with used oil, then it can be recycled or burned as used oil. If it is not dripping with used oil and it is not hazardous waste, then it can be burned or disposed of in the trash.
Used transmission fluid	Used oil	Recycle or burn in your shop for heat
Used brake fluid	Used oil	Recycle or burn in your shop for heat
Used antifreeze	Nonhazardous waste if it is properly recycled at your shop	Recycle. Antifreeze is deadly to animals. Be careful that animals can't get to any antifreeze that is in your shop.
Used tires	Nonhazardous solid waste	Recycle, retread or resell
Alkaline batteries	Typically a nonhazardous waste	Recommend you manage as universal waste (see universal section of this guide). If the batteries are hazardous waste, then manage them as universal waste or as hazardous waste

Type of waste	Category of waste if not mixed with hazardous wastes	What you can do with it
Lead-acid batteries	Universal or hazardous waste	Reclaim the batteries through regeneration by taking them back to your vendor, manage them as universal waste, or manage them as hazardous waste.
Used brake pads	Hazardous waste or solid waste	Brake pads often contain copper which can be very harmful to fish. It is a best practice to manage the used brake pads the same as hazardous waste. Used brake pads may be disposed in the trash if they are not hazardous waste.
Used solvents and cleaning agents	Many are hazardous waste. Some may not be.	If hazardous waste, filter or distill the waste and reuse it onsite, or send the waste to a recycler or a hazardous waste facility. If it is not hazardous waste, recycle it onsite or offsite.
Solvent spill absorbent material	Solid waste. May be hazardous waste.	If hazardous waste, send the absorbent material to a recycler or hazardous waste facility. If it is not hazardous waste, and the absorbent material is soggy, then add more absorbent material until all the solvent is absorbed. Once absorbed, dispose in the trash.
Waste fuels and gasoline	Many are hazardous waste. Some may not be.	If the waste fuel is hazardous waste, send it to a hazardous waste facility. If it is not hazardous waste, recycle it.
Spilled or unusable paints and thinners	Many are hazardous waste. Some may not be.	Depends on the paint or thinner. If paint or thinner that is not hazardous waste is spilled, clean it up (or let the paint dry out) and put the waste in the trash. If the paint or thinner is hazardous waste, use absorbents to pick up the entire spill and send the absorbents to a hazardous waste facility.
Aerosol cans	Many are hazardous waste. Some may not be.	Depressurize the cans safely with an aerosol can puncturing device. If the contents are hazardous waste, empty them into a hazardous waste container. Once the can is empty, it can be recycled as scrap metal.

General Safety Guidelines, Tips and Regulations

1. Keep manifests/receipts together and in chronological order. Be certain that manifests/receipts are legible and specific as to: amounts, measurements used, and prepared properly and to your COMPLETE understanding.
2. A Generator's responsibility does not end when the hazardous waste is removed from your facility by an authorized hauler. A generator's responsibility continues from CRADLE TO GRAVE. The manifest is designed to trace the hazardous waste from cradle to grave, therefore timely receipt and maintenance of the manifest copies is mandatory and it is the responsibility of the generator.
3. Manifests must be organized in a method that makes it easy to identify the status of the particular manifest. We recommend organizing them into the following 3 different categories:
 - Open
 - Closed
 - Exception/Discrepancy
4. The manifest copy sent from the treatment facility must be received within 35 days from the time of pick-up and stapled together with original copy received at the time of waste pick-up.
5. Appropriate manifest copies MUST be sent to the proper agencies listed on manifest copies.
6. NEVER let any waste accumulate to capacity of either space available in facility for storage (tires and batteries) or any container or containers used for storing (waste naphtha, used oil, or waste thinner.)
7. Try to reduce the amount of waste generated by implementing a "Waste Minimization Program".
8. Conduct weekly inspections of waste accumulation points, making sure that containers are in good condition and are properly marked. These inspections must be recorded and kept on file for a period of three years.
9. Make certain that employees are aware of emergency procedures in case of a spill, explosion, etc.
10. Chemically test any wastes if its contents are unknown.
11. Keep the area where hazardous waste is stored free from debris and clutter.
12. Make certain that there is adequate space for maneuvering around containers at accumulation points.
13. Place drums of used thinner, etc., on pallets so that they can be moved easily throughout the facility.
14. Make certain that all haulers and TSD facilities have EPA ID#'s.

15. Written authorization MUST be received from TSD facility in order to verify that they are able to treat a particular waste.
16. Communicate with other Automotive Dealerships as well as Automotive Associations for recommendations as to which haulers and TSD facilities may best suit your needs.
17. Batteries should be stored together in one location in the facility. They should NOT be stored directly on the floor. The best place to store batteries is in a LEAKPROOF TUB. A "CORROSIVE" placard should be used to designate area where waste batteries are stored.
18. Receipts must be obtained when used tires and used batteries are REMOVED from your facility by an authorized hauler. (Directions to retrieve a list of authorized tire haulers can be found on your Client access portal under Reference at edmc-safety.com.)
19. ALL underground and above ground storage containers must be registered and yearly fees must be paid.
20. NO container or drum should be left open to the atmosphere. Containers must be kept closed at all times except when adding waste.
21. No hazardous waste may be kept on-site for a period longer than 180 days (6 months).
22. Pursuant to Pennsylvania's Tier II reporting under Title III, Section 312, the State, the County's Local Emergency Response Team and the Fire Department in your municipality must be notified in writing as to which wastes are housed on-site if the amount is above the minimum reportable threshold. An emergency coordinator must be designated. This person MUST be able to be reached 24 hours a day and he/she MUST know what steps are needed to be taken in the event of an emergency. (See the Pennsylvania Tier II Emergency and Hazardous Chemical Inventory on the last page of this report to see if you are a reportable facility.)
23. Dealerships that are qualified facilities with between 1,320 and 10,000 gallons in above ground oil storage capacity and with a good spill history can prepare a simple, self-certified Spill Prevention, Control and Countermeasure (SPCC) plan template instead of hiring a professional engineer to draft a complex written plan.

Emergency and First Aid Equipment

MAKE CERTAIN THAT EMPLOYEES ARE AWARE OF WHO TO CONTACT IN AN EMERGENCY. AN "EMERGENCY CONTACT" FORM NEEDS TO BE COMPLETED AND POSTED AT APPROPRIATE LOCATIONS IN YOUR FACILITY.

EMERGENCY EQUIPMENT SHOULD BE KEPT NEAR ACCUMULATION POINTS, BUT NOT SO NEAR THAT IT CANNOT BE REACHED DURING AN EMERGENCY SPILL OR FIRE.

Required Equipment:

1. Telephone or hand held radio.
2. Water at adequate pressure.
3. Internal communication and alarm system (BELL OR HORN).
4. Portable fire extinguisher, fire control equipment, and spill control equipment.
5. Required telephone numbers (MEDICAL, FIRE, POLICE) must be kept in convenient and accessible locations. (Complete and post the Emergency Contact form with the appropriate information. This form can be retrieved from your Client access portal under Reference at edmcsafety.com)

Emergency Response Equipment:

1. SALVAGE DRUM
2. GLOVES
3. RESPIRATOR
4. ABSORBENT
5. PUSH BROOM
6. SHOVEL
7. FIRE EXTINGUISHER
8. APRON
9. GOGGLES
10. FACE SHIELD
11. BOOTS
12. COVERALLS

EQUIPMENT NEEDS TO BE KEPT ON-SITE AT ALL TIMES.

ANY EQUIPMENT NOT PRESENTLY HOUSED AT YOUR FACILITY NEEDS TO BE OBTAINED AS SOON AS POSSIBLE.

Disclaimer

Please be advised that our firm is not in the business of making determinations with respect to compliance status or activities related to the Clean Air Act, the Safe Drinking Water Act and/or the SPCC Rule. We neither possess the instrumentation to make such determinations, nor do we give legal advice on these matters. Information and instructions to assist in your efforts to comply with the Spill Prevention, Control, and Countermeasure (SPCC) Rule if applicable, can be retrieved from your Client access portal under Reference at edmcsafety.com)

Our service provides unannounced, on-site hazardous waste management inspections designed to assist in your compliance with Title 25 of the Pennsylvania Code, Chapter 262. If you have any questions or comments on other issues related to the management of your hazardous waste we will attempt, as a courtesy, to assist you.

Pennsylvania Tier II Emergency and Hazardous Chemical Inventory

Reporting Thresholds: Minimum thresholds have been established for Tier II reporting under Title III, Section 312. These thresholds are as follows:

- For Extremely Hazardous Substances (EHSs) designated under section 302 of Title III, the reporting threshold is **500 pounds** (or 227 kg.) or the threshold planning quantity (TPQ), whichever of those two amounts is lower.
- For all other hazardous chemicals for which facilities are required to have or prepare a Material/Safety Data Sheet (M/SDS), the minimum reporting threshold is **10,000 pounds** (or 4,540 kg.).

Do you have any of the following on site?

	Gasoline	Motor Oil	Used Motor Oil	Other Chemicals
Size of Storage Tank(s) (in gallons)				
Are they <u>above</u> or <u>below</u> ground tank(s)				
Are the tank(s) stored <u>indoors</u> or <u>outdoors</u>				
How are chemicals added to the tank(s), i.e. Pump System or Manually				
Exact location of storage tank(s)				
DAILY QUANTITY: - MAX amount - AVG amount	Max	Max	Max	Max
	Avg	Avg	Avg	Avg

Your facility is: ☐ Reportable ☐ Non-Reportable County _____ Municipality _____

Owner/Operator Name & Address: _____

Facility Emergency Contact: _____ 24-hour phone _____

Tier II Information Contact _____ 24-hour phone _____

***If you need assistance in determining your Tier II reporting requirements, please complete and return this on- page form to our office via e-mail. As a courtesy, we can assist in your Tier II reporting requirements. ***

SPCC Recommendation: If your facility less than 10,000 gallons in above ground oil storage capacity, you are required to complete a SPCC Plan. (The fact sheet on the Spill Prevention, Control, and Countermeasure (SPCC) Rule can be retrieved from your Client access portal under Reference at edmcsafety.com.)







