LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
FIELD INTERVIEW FORM

AGENCY INTEREST: 320964  INSPECTION DATE: 10-10-2014 TIME OF ARRIVAL: 13:15
ALTERNATE ID#: see below DEPARTURE DATE: 10-19-2014 TIME OF DEPARTURE: __________

FACILITY NAME: Clean Harbors Colfax, LLC PH #:

LOCATION: 3763 Highway 471

RECEIVING STREAM (BASIN/SUBSEGMENT): Colfax, LA

MAILING ADDRESS: 13351 Scenic Highway, Baton Rouge, LA 70807-1021

FACILITY REPRESENTATIVE: Paul Andrews TITLE: Sr. Compliance Manager

FACILITY REPRESENTATIVE PHONE NUMBER: 225-778-3645

NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above): Phil R. Bellavance Sr. Vice President, Clean Harbors - Columbia, SC 803-641-3407

INSPECTION TYPE: CET PROGRAM: AIR UST WASTE WATER OTHER GW

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

<table>
<thead>
<tr>
<th>Media</th>
<th>Alternate ID #s</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>32043CC0010, 1120-C0010-09AA</td>
</tr>
<tr>
<td>Hazardous Waste</td>
<td>Grandwater, LA A981055491</td>
</tr>
<tr>
<td>Water Quality</td>
<td>LO101931</td>
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</tbody>
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A Multi-media Compliance Evaluation Inspection (CET) was conducted at Clean Harbors Colfax, LLC (CHC) to determine their compliance with the Air Quality Line33-111.

AREAS OF CONCERN:

<table>
<thead>
<tr>
<th>REGULATION</th>
<th>EXPLANATION</th>
<th>CORRECTED?</th>
<th>YES NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>See Individual Media, Pages</td>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

PHOTOS TAKEN: [ ] [ ] SAMPLES TAKEN: [X] [ ] (Attach Chain-of-custody)

RECEIVED BY: SIGNATURE: [Signature]

PRINT NAME: Paul Andrews

(NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)

INSPECTOR(S): see page 2  CROSS REFERENCE: 
ATTACHMENTS: 

REVIEWER: 

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes, regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

REVISED: 09/14/2009 PAGE 1 OF 4
INSPECTOR OBSERVATIONS CONT'd:

40 CFR 1, et al., Water Quality (40 CFR 33-18), and Hazardous Waste (40 CFR 245) regulations.

LDEQ Inspection personnel are:
- Karen Price  Team Leader Hazardous Waste
- Phyllis Luke  Hazardous Waste
- Jimbo Forbus  Hazardous Waste
- Craig Easley  Hazardous Waste
- Brian Fontenot  Air Quality
- Yanfui Zhao  Air Quality
- Shane Miller  Water Quality
- Melissa Miller  Groundwater (USTRD)

CHC representatives are:
- Paul Andrews  Senior Compliance Manager
- John Arbuthnot  Director of Facility Closures
- Joe Ganey
- Diane Netherlin
- Brandon Rush
- Shawn Bryant

A synopsis of the events which occurred during the inspection:

- In-briefing: introduction of CHC personnel, required CHC safety training, purpose of inspection.
  - J. Ganey conducted tour of facility.
  - Air Quality: Records review, witness open burn.
    - LDEQ: B. Fontenot, Y. Zhao

- Hazardous Waste:
  - Records Review: LDEQ: J. Forbus, C. Easley
    - CHC: P. Andrews, D. Netherlin
    - CHC: J. Arbuthnot, S. Bryant

INITIALS OF RECEIPT: [Signature]
INSPECTOR OBSERVATIONS CONT'd:

**Water Quality**

Facility Inspection: LDEQ - S. Miller; CHC - J. Arbuthnot, Shawn Bryant

Records Review: LDEQ - S. Miller; CHC - Paul Andrews, D. Netherlin

10/12/2016

- Hazardous Waste: records review
  - LDEQ: C. Easley, J. Fearle, P. Luke
  - CHC: J. Arbuthnot, B. Rush, D. Netherlin

**Water Quality**

- Collected water and sediment
  - Samples from stormwater retention pond
  - And waste streambed sediment sample

**Air Quality**

- Observed a burn event
  - Y. Zhao; requested burn records

10/19/2016

- Exit Interview held with LDEQ inspection personnel and Clean Harbors representatives. Areas of concern, observations, and records request were discussed. The Field Interview Form for all media was discussed. A copy of the Field Interview Form was given to CHC representatives.

- Findings are still under review
  - records request email to CHC
  - Discussions with media permits regarding observations and areas of concern
  - Follow-up meeting to be scheduled with CHC and LDEQ permits other personnel for permit language
  - Photograph copies given to CHC
  - Request copies of split sample results

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REVISED: 02/03/2003
AIR QUALITY

- A Minor Source Air Permit Full Compendium Evaluation Inspection was conducted as part of a Multi-Media CFI at CNC.

- Records & reports were reviewed prior to, during, and after the inspection.

- Walk-throughs were conducted to evaluate emissions points at the facility's functional areas and witness treatment burns on 10/10/16 and 10/11/16, respectively.

- Y. Zhao visited CNC 4 representatives of LDEQ's Haz. Waste Water Team on 10/18/16 to retrieve records & witness another treatment burn.

Noted during the inspection & felt reviewed:

- Records of all burns not maintained.

- Failure to comply with all Haz. Waste Dry Regulations.

- Treatment Burn Times Exceed Five Minutes In Duration.

- Open Burning of Solid Waste.

- Prevalent Winds not tracked.

- Potential Bias in Location of Haz. Waste Readings.


INITIALS OF RECEIPT: [Signature]
Water portion of multi-media inspection

- Permit was available for review but is expired at this time; application was submitted & determined complete so facility will continue to operate under expired permit; permit application indicates storm water from the pad for Outfall 001; Section VIII of the permit application (Section E, question #8) asks about toxic components in the discharge and this question was answered N/A; does not adequately reflect the discharge for Outfall 001.
- Facility has a storm water pond to collect water from the burn pad area for Outfall 001 and 2 small ponds for sanitary wastewater (002 + 003); a small leak was noted from the pond at Outfall 002 (front office building).
- The site is a hazardous waste treatment, storage, and disposal facility for the thermal treatment of reactive/explosive waste; area was well kept overall but storm water issues existed.
- No discharge at the time from Outfalls 001-003; no issues noted in discharge areas.
- Flow is estimated as required; pond level before and after discharge are used to estimate flow for Outfall 001.
- SWPs were available for review; plan was signed & dated 9/23/13; annual inspection conducted by the facility is very brief and inadequate; plan addresses the pad that could blow off of the pad but does not address other materials noted; wash area at maintenance shed needs to be reflected in the plan; equipment from the burn pad was being stored on the burn pad and exposed to storm water; materials from "kick dots" noted outside the burn pad area; other equipment that had been used on the burn pad was not stored out in the open in other areas of the facility; roll off boxes that were not under cover had covers on them; emergency discharge from the storm water pond at Outfall 001 (rip rap area) is identified on a drawing in the SWP but is not diverse for turtle in the plan.
- SPCC Plan was available for the ASTS on site; tanks are within containment and under roof; if storm water does collect in the containment it is hauled off; no drain valves on containment areas; no signs noted at loading/unloading area concerning disconnecting of lines prior to departure; training records as per the plan could not be provided; plan was dated April 2015.
P-H buffers were checked and found to be current; calibration logs for the pH meter are not being kept.

According to facility records, the last discharge from Outfall 201 was 6/11/11.

Samples collected on 3/18/11 and 5/24/11 arrived at the lab with no ice and a temperature of 18.1°C.

Samples were collected on 10/18/11 from the storm water pond and outfall stream by a contract sampler for the facility. Samples were split between Clean Harbors and DEQ; water samples were taken from the pond and soil samples were taken from the pond and outfall stream.

Water samples collected on 10/18/11 will be analyzed for Metals, TOC, COD, Ammonia, Perchlorate, DTEx, Explosive Compounds, Semi-VOC, VOC.

Soil samples collected on 10/18/11 will be analyzed for VOC, Semi-VOC, Explosive Compounds, Perchlorate, Metals, TC, and Emission Totals.

Samples will be shipped via FedEx on 10/19/11 and will go to Test America.

DMR review from June 2014-June 2016 revealed 1 pH excursion; no compliance report was attached.
Site tour of RCRA permitted area included the following:

- RCRA Thermal Treatment Area
- Retention Pond
- Liquid Storage Building (which included 3 magazines)
- Preparation Building
- Waste Storage Building

Facility recently repaired cracks, gaps & pitted areas in the concrete of the thermal treatment area. At the time of the inspection, several cracks were noted on the concrete floor along the berm walls. A gap in the concrete berm in the north-east corner was also noted. Facility made these repairs without a permit.

A review of the daily inspection logs (date range 1/1/16-10/1/16) showed that the burn pad failed almost every inspection. Daily inspections for 1/1/16 through 7/12/16 were marked as passed, however, the deficiencies in the thermal treatment area remained. Facility failed to note these deficiencies.

When asked by inspection personnel, Joe Gainey replied that the contractor, who performed the concrete repairs, did not comply with the work order; therefore, necessary repairs were not made. Also, material used to fill gaps & cracks in the concrete were noted to be failing. Photos taken.

Facility failed to make necessary repairs to thermal treatment area upon discovery during their daily inspections.

During the inspection of the thermal treatment area, the inspectors examined the area adjacent to the pad and noted ash on the ground.
Inspectors also noted equipment such as pans, rails, etc. outside of the containment sitting on plastic sheeting. When asked whether or not the equipment outside the containment had been decontaminated prior to removal from the treatment area, the facility staff did not know. Facility failed to prevent residue & debris generated during the thermal treatment process from contaminating the surrounding area.

Inspectors noted 7 drums in the waste storage building that were sent to CT, Oklahoma, where they were rejected for carrying P009 listing, and returned to CTC. The Department requests plans to remove this waste off-site.
Records Review:

Permit Condition III.F requires the permittee to conduct personnel training as required by LAC 33: V. 1515.A. Facility provided documentation which outlined job titles, names of those holding each job title and written descriptions for each position listed. Records documenting training were provided for review. Training records documenting compliance with LAC 33: V. 1515. A, B, and C were provided. Training given to personnel regarding the management of hazardous include but are not necessarily limited to: DOT Regulation Haz-Mat

Annual RCRA Training
OSHA 24 Hr. Hazwoper
Contingency Plan
On-site Waste Generation & Disposal
Waste Receiving/container inspection
Haz.com

An outline of the training program was provided. Facility appears to be following the training outline & requirements of LAC 33: V. 1515. A
Records Review

Annual Hazardous Waste Reports

(2014)
The 2014 annual hazardous waste report was reviewed. Hazardous waste carrying the following waste codes was transported for disposal in 2014; 0001, 0005, 0006, 0007, 0008, 0009, 0010, 0011, 0013, 0004, 0030, K044, K045, K046.

Hazardous waste carrying the following waste codes was received from off site for treatment; 0001, 0003, 0004, 0005, 0006, 0011, 0030, 0036, F003, K044, K046, K045, P048, P081.

(2015)
The 2015 annual hazardous waste report was reviewed. Hazardous waste carrying the following waste codes was generated on site and transported for disposal in 2015; 0001, 0003, 0004, 0005, 0007, 0008, 0010, K044, K045, K046, P081.

Hazardous waste carrying the following waste codes was received from off site for treatment; 0001, 0002, 0003, 0005, 0006, 0007, 0008, 0010, 0011, F003, F005, K044, K046, P081.

Facility appears to be managing wastes allowed by the permit/waste analysis plan.
Records indicate that the facility operated a surface impoundment without a permit or other authorization. The retention pond received characteristic and/or listed hazardous wastewaters originating from the thermal treatment area.

Facility failed to make a proper determination as to whether generated solid waste were hazardous waste. Facility failed to determine whether stormwaters/wastewaters contaminated with residues originating from the thermal treatment area. Facility failed to determine whether sediment/sludge removed from the retention pond were hazardous.

Facility failed to test wastes to verify that the waste met treatment standards for land disposal regarding sediment/sludge removed from the retention pond.

Facility failed to determine whether a listed waste met applicable treatment standards for land disposal. Specifically, the facility failed to determine whether sediments removed from the retention pond and sent for land disposal met applicable hazardous standards.

HW manifests 001879995 FLE dated 6/5/14
001879994 FLE dated 6/9/14
listed 0005 + 0011 for disposal however, 0011 was not listed on Land Disposal Notification Form.
HW manifest 007748654 FLE dated 8/15/14
listed 0005 + 0007 for disposal however, 0007 was not listed on Land Disposal Notification Form.
Records Review

Facility made revisions to hazardous waste management unit inspection plan without submitting a permit modification. (2 revisions)

Facility failed to include all requisite information in hazardous waste management unit inspection records.

Facility made repairs to thermal treatment area pad without submitting a permit modification.