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MAY 2016
Hazardous Waste Section

May 10, 2016

CERTIFIED MAIL No.70142120000009760676

Mrs. Julie Woolsey, Chief
Hazardous Waste Section
North Carolina Department of Environmental Quality
1646 Mail Service Center
Raleigh, NC 27699

Re: Release Incident/Contingency Plan Report
Safety-Kleen Systems, Inc.
Raleigh, North Carolina

Dear Mrs. Woolsey,

In accordance with the provisions specified in Hazardous Waste Management Permit No. NCD000776740 R2 (Permit Attachment G (Contingency Plan)), and as specified in 40 CFR Part 264.56(i), as adopted in 15A NCAC 13A. .0109, Safety-Kleen Systems, Inc. ("Safety-Kleen") is submitting this report for a spill/release that occurred at the above referenced facility on May 3, 2016 requiring implementation of the contingency plan. Details of this spill event are included in the enumerated text below.

1.) ***Name, address and telephone number of the facility:***

Safety-Kleen Systems, Inc.
125 Sommerville Park Road
Raleigh, North Carolina 27603
(919) 772-6622

2) ***Name of individual reporting the spill:***

Paul Krug, Transportation Compliance Specialist, Safety-Kleen Systems, Inc. (via telephone on 5/3/16, approximately 2:00 pm)

3) ***Date, time and type of incident:***

While loading various containers of transfer waste via forklift to an outbound trailer, a fifty-five gallon drum of a waste sodium hydroxide solution (D002 hazardous waste) fell to the surrounding concrete surface spilling approximately fifty (50) gallons, which entered a nearby grated storm sewer inlet conveyance sump and drainage pipe. The incident occurred on Tuesday, May 3, 2016, at approximately 12:30 pm.

4) ***Name and Quantity of Material Involved:***

Approximately fifty (50) gallons of a hazardous waste sodium hydroxide solution (D002).

5) ***The extent of Injuries, if any:***

None.

6) ***An assessment of the actual or potential hazards to human health or the environment, where this is applicable:***

The majority of the spilled material was immediately contained within the concrete storm water drain inlet pipe underneath the site and the concrete catch basin near the outfall. Facility personnel verified that none of the spilled material had discharged through the actual storm water outfall at the time of the initial response, and efforts began to recover the majority of the material collecting in the catch basin near the outfall point. Prior to completing the recovery of all of the spilled material, a thunderstorm occurred and proceeded to wash out the remaining spilled material through the storm water outfall discharge point and onto the adjoining earthen drainage swale owned by Popular Springs Christian Church. Safety-Kleen estimates that approximately five (5) gallons of the spilled material was released through the storm water outfall during the subsequent storm event.

After the storm event, pH field testing was performed at several points along the downstream portion of the off-site earthen swale to determine if any increases in pH could be detected as anticipated from the sodium hydroxide solution. Due to the intensity of the thunderstorm and large volume of storm water discharging from the storm water outfall, we believe that the small amount of the caustic material actually released through the outfall to the environment was diluted to the point where any hazards or threats to human health or the environment would have been minimal, if at all. Subsequent field testing conducted the following day of the standing storm water remaining in the drainage swale after the storm event did not indicate any increased elevations of pH above 7.0.

7) ***Estimated quantity and disposition of the recovered material that resulted from the incident:***

Approximately 55 gallons of the spilled waste sodium hydroxide solution and storm water were recovered and transferred to a drum. The recovered waste was manifested to the original destination facility for treatment/disposal.

8) ***Cause of the discharge:***

The investigation of this spill event revealed that the cause of the spill was due to a drum falling off of a pallet while moving the material by forklift from ground level to an outbound box trailer. The pallet contained a total of two fifty-five gallon drums and one thirty gallon drum. During maneuvering by the forklift one of the fifty-five gallon drums became unbalanced (breaking the shrink-wrap), and tilted off the pallet falling to the concrete below causing the lid to dislodge and

spilling the contents to the concrete and nearby the grated storm water drain inlet located adjacent to the covered transfer waste storage area.

9) Preventative measures taken to prevent recurrence:

Additional drum securement measures have been implemented to better secure drums of waste materials to the pallets while being transferred by forklift. Also, additional spill containment practices have been implemented to ensure that the grated storm water inlet catch basin is covered by a drain blocking device to preclude any other potential spills that may occur in this area during live loading/unloading activities from entering the storm water drain conveyance system and escaping through the storm water outfall.

Further review of the response to this incident by Safety-Kleen staff confirmed that the contingency plan was properly implemented for this type of incident and no changes to the plan are warranted at this time. This letter also serves as notification that all emergency response equipment used for this incident has been replaced and is ready for use.

If you have any additional questions related to the above information, please do not hesitate to contact me at 336-644-0332.

Sincerely,

Todd M. Blake

Todd M. Blake
Environmental, Health and Safety Manager

cc: Mark Burnette, RI & MSR Program Supervisor, NCDEQ- Hazardous Waste Section
Bradley Bailey, Resident Inspector, NCDEQ – Hazardous Waste Section
Derek Leonard, Safety-Kleen (Raleigh)
EHS File No. 1430