

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

1) Inspector and Author of Report

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2) Facility Information

TAV Holdings, Inc.
3311 Empire Boulevard SW
Atlanta, Georgia 30354
EPA ID # GAD033537663

3) Primary Contact

Alex Camozzi, Director of Operations
acamozzi@tavholdingsinc.net

4) Inspection Participants

Heli Tello, TAV, Fabrication Inventory Manager
Alex Camozzi, TAV, Director of Operations
Bob Brown, TAV
Richard Posey, GAEPD Solid Waste
Lina Yazbak, GAEPD Industrial Stormwater
Jaliyl Collins, GAEPD Industrial Stormwater
Faney Foster, GAEPD Hazardous Waste
Jeffrey Hargrove, GAEPD District Office
David Champagne, EPA, Region 4
Brooke York, EPA, Region 4

5) Date of Inspection

October 6, 2021

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).

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

This unannounced compliance evaluation inspection (CEI) was conducted to evaluate the facility's compliance with applicable requirements of RCRA and corresponding the Georgia Environmental Protection Division (GAEPD) regulations.

8) Facility Description

TAV Holdings, LLC (TAV) operates a facility that includes at a minimum; offices and warehouse storage at 3311 Empire Boulevard SW; the northern portion of the parking lot at 3325 Empire Boulevard SW; the Keebler Complex (3 buildings, the White Building, the Process Building and the Keebler Building) at 111 Hollow Tree Lane; the Fabrication Shop at 3405 Empire Boulevard SW; and the laydown yard and stockpile at 3320 Empire Boulevard SW. The TAV facility receives automobile shredder residue (ASR), fluff generated from the shredding of automobiles, various stages of ASR in the recovery process, and previously land filled ASR, from multiple offsite sources. The material received would otherwise be disposed of in solid waste landfills that are appropriately designed, operated, and permitted to receive, store, and dispose of the solid wastes. At the time of the CEI, the only environmental permit TAV held was an industrial stormwater permit (GAIS14016) from GAEPD.

Inspectors were informed that the incoming material is received at no cost to TAV. The material TAV receives does not appear to be primarily made up of metal (more than 50%) and is not from the mining of ore or minerals. TAV has not notified of its intent to conduct treatability studies, or as a secondary materials handler. All the materials received for processing at TAV are solid wastes. The solid waste received is stored outside upon delivery. The solid waste is separated based on particle size, and undergoes several screening and particle size reduction processes, in an effort to recover metals, primarily copper. As the solid waste is processed, material not high enough in recovered metals to be sold for recovery or smelting, is stored onsite, and recirculated through the process indefinitely. No disposal records of any of the wastes generated from the processing of the ASR have been provided.

9) Previous Inspection History

No prior RCRA inspection conducted at the facility.

10) Findings

The inspectors arrived at TAV at 9:05 AM EDT. Mr. Tello greeted the inspectors Richard Posey, GAEPD Solid Waste, Lina Yazbak, GAEPD Industrial Stormwater, Jaliyl Collins, GAEPD Industrial Stormwater, Faney Foster, GAEPD Hazardous Waste, Jeffrey Hargrove, GAEPD District Office, David

Champagne, EPA, Region 4, and Brooke York, EPA, Region 4, the inspectors showed their credentials and explained the purpose of the inspection and indicated the use of a camera to take pictures during the inspection. In addition, the EPA inspector discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. Mr. Tello insisted that the inspectors wait until the Director of Operations, Alex Camozzi, arrived to escort the inspectors through the facility. Once Mr. Camozzi arrived the inspectors confirmed the personal protection equipment required for the facility tour. The facility tour began at approximately 10:05 AM EDT.

The inspectors separated into 2 groups. Mr. Camozzi escorted the hazardous waste inspectors.

Receiving

The facility tour began in the receiving area. Several piles of ASR, solid waste, were observed in this area (Figures 48 and 49). The solid waste in this area is stored in open piles that are exposed to weather elements. The area had received rainfall in the days prior to the inspection and the solid waste piles were wet. Water contaminated with small particles was observed flowing from the south to the north where the outdoor processing, storage and Receiving Area are located. The water was observed to be pooling in the area immediately east of the Receiving Area (Figures 87 and 88). This area is known as the Jig Storage.

The inspectors reviewed the sources of the water and found that stormwater and operation process water, from the processing of the solid waste, was being swept out of the building. Due to holes in the roof and inadequate containment, both sources of water flow through the facility from south to north and collect in the asphalt area seen in Figures 87 and 88.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

The inspectors oversaw numerous piles of solid waste in various stages of processing being stored outside. Some of these piles were of solid waste that had been reduced in particle size that would pass through the US Standard #200 sieve.

Processing

The Main Processing Area is inside the buildings. The facility utilizes ball mills, particle size separation, eddy current, and vibration to separate metal particles from the material. Inspectors observed that much of the building was being used to store waste that had already been processed at least once. The waste consisted of very small particle sizes, as seen in Figures 60 and 61. The facility claimed that they were storing the already processed solid waste material with the intent of continuing to process it and claimed that it had recoverable concentrations of copper. The inspectors asked how long the material had been stored and how frequently the material was processed. The facility did not provide any information demonstrating how long and/or how frequently the solid waste was processed/stored.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure

wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Wastewater Treatment/Clarifier

The processes all include the use of water. The facility collects stormwater in several areas at the facility and uses it in the processes. Much of the process water is swept out the doors of the process building, where it accumulates in low lying areas and it is pumped to a tank where flocculant is added to aid in the precipitation of solids from the water. The solids are removed by a backhoe and placed back into the processing. From the clarifier the water is pumped to a large tank. At the time of the CEI, the clarifier and the tank were observed to be overflowing. The secondary containment in the Wastewater Treatment (WWT) Area could not be properly inspected due to the accumulation of sludge on the surface. Figures 71 – 79 illustrate the condition of this area at the time of the CEI.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Storage

The area to the northwest of the WWT Area is used to store this material. The facility claims that the solid waste material continues to contain recoverable metals. However, the inspectors observed that the material is being allowed to wash offsite with stormwater. The facility has failed to manage the material as a commodity.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Outfall 003

The inspectors observed Outfall 003. The area had a large concrete tank/settling basin that appeared to be used to separate solids from liquids. At the time of the CEI the basin was completely full of sludge. Evidence of stormwater and sludge overflowing the basin and by-passing the Outfall can be seen in Figures 100-106.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Lay-down Yard and Stored Waste

The parcel across the street from 3311 Empire Boulevard was observed to be used for storing old equipment and process solid waste material. The waste is piled in a landfill-like fashion as seen in Figures 84 and 112.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Laboratory

Facility representatives were able to inform inspectors of the percent metal content in various piles of the solid waste material onsite. The Facility Representative informed the inspectors of the onsite laboratory. The inspectors spoke with the Laboratory Manager who explained that all the solid waste sold from the facility is analyzed prior to leaving the facility, that at least some of the solid waste is analyzed prior to processing, and some in-process material had been analyzed. All the samples ever analyzed are stored in an onsite data system. The inspectors asked what the average amount of lead in the samples analyzed had been and requested the ability to review the data. The inspectors were informed that lead content could range from 0.25% to 13% but it was not clear what material this estimate was for. The data was not available for review at the time of the inspection. The inspectors observed a box holding nine (9) 2.5-liter bottles of waste nitric acid and waste hydrochloric acid. The bottles collecting waste were labeled with the product labels and were not labeled hazardous waste or dated. The technician estimated that a 2.5-liter bottle takes approximately 1 month to accumulate.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Records

No records were reviewed at the time of the inspection. The inspectors requested specific records at the time of the inspection. On October 21, 2021, the EPA issued a Request for Information pursuant to Section 3007 of RCRA. As of the drafting of this report the information had not been received. At the conclusion of the CEI, the inspectors went over the preliminary concerns observed during the CEI.


12) Signed

BROOKE YORK

Brooke York
Inspector and Author of Report

**Champagne,
David**

David Champagne
Inspector

 Digitally signed by BROOKE YORK
Date: 2021.11.18 15:39:06 -05'00'

Date

 Digitally signed by Champagne,
David
Date: 2021.11.18 16:38:35 -05'00'

Date

13) Concurrence and Approval

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ
Date: 2021.11.18 16:50:44 -05'00'

Araceli B. Chavez

Date

Chief

RCRA Enforcement Section

**TAV Holdings, Inc.
Atlanta, Georgia**

EPA ID No.: GAD033537663

**EPA RCRA CEI Photographs
“PXL” Photographs taken by: David Champagne
Camera Model: Google Pixel 3 XL**

**“IMG” Photographs taken by: Brooke York
Camera Model: iPhone XR**

Photos taken by Brooke York and David Champagne
October 6, 2021