



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-656-7802

November 4, 2019

Thomas Wideman
Director of Health, Environmental, Safety and Sustainability
Bio-Lab Incorporated
1700 Old Covington Highway SW
Conyers, Georgia 30012

SUBJECT: NOTICE OF VIOLATION/COMPLIANCE STATUS LETTER

Large Quantity Generator Requirements
Bio-Lab Incorporated
Conyers/Rockdale County
EPA ID Number: GAD991274820

Dear Mr. Wideman:

On October 8, 2019, Jocelyn Carver and Emilea Reiner with the Hazardous Waste Management Program conducted a Focused Compliance Investigation of Bio-Lab Incorporated in Conyers. Hazardous waste generators in Georgia are required to comply with Georgia's Hazardous Waste Management Act (O.C.G.A. 12-8-60 et. seq.), the Georgia Rules for Hazardous Waste Management (Chapter 391-3-11), and the federal regulations adopted by reference.

The following violations were observed during the inspection:

Rule 391-3-11-.08 "Standards Applicable to Generators of Hazardous Waste," which incorporates 40 CFR Part 262:

1. 40 CFR 262.17(a)(1)(iv) "Conditions for exemption for a large quantity generator that accumulates hazardous waste" – For failure to close one (1) 55-gallon drum labeled as "Hazardous Waste" in the 90-day accumulation area.

The following area of concern was observed during the inspection:

1. At the time of the investigation, there appeared to be inadequate aisle space between drums in the 90-day accumulation area. While the inspectors were able to read the labels on the drums, there was inadequate space to allow unobstructed movement of fire protection equipment, spill control equipment, and decontamination equipment. The facility personnel began creating aisle space during the inspection. No violations were noted in this area.

Based on documentation that you submitted on October 11, 2019, we have determined that the violation and area of concern has been corrected. No further action is required on your part at this time.

Notice of Violation/Compliance Status Letter

Bio-Lab Incorporated

November 4, 2019

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Enclosed is a copy of the Complaint Inspection Report for your reference. If you have any questions regarding this matter, please contact Jocelyn Carver by phone at (404) 657-8692. Thank you for your cooperation in protecting human health and the environment in Georgia.

Sincerely,



Nichole Rodgers
Unit Coordinator
Generator Compliance Unit

Enclosures (1): Complaint Inspection Report
c: Thomas Wideman (Bio-Lab Incorporated)

File: Bio-Lab Incorporated, Conyers
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COMPLAINT INVESTIGATION REPORT

DATE: October 18, 2019

SITE NAME: Bio-Lab Incorporated

COUNTY: Rockdale

LOCATION (ADDRESS): 1700 Old Covington Highway SW, Conyers GA 30012

LATITUDE: 33°40'18" N

LONGITUDE: 84°02'43" W

COMPLAINT # (from CTS): 91214

EPA ID #: GAD991274820

COMPLIANCE OFFICER: Jocelyn Carver, Environmental Engineer JEC
Generator Compliance Unit
Georgia Environmental Protection Division (GA EPD)

Emilea Reiner, Environmental Compliance Specialist
Generator Compliance Unit
GA EPD

Peter Nguyen, Environmental Engineer
Air Protection Branch
GA EPD

DATE AND TIME OF INVESTIGATION: October 8, 2019 at 9:45 AM

OFFICIALS/PERSONS CONTACTED (NAME AND CONTACT INFO):

Thomas Wideman
Director of Health, Environmental, Safety and Sustainability
1700 Old Covington Highway SW
Conyers, Georgia 30012
770-483-2600 ext. 8527

COMPLAINT ALLEGATIONS:

Complainant claimed that the facility was holding hazardous waste beyond the 90-day accumulation limit and tanks holding hydrochloric acid were leaking. In addition, the complainant claimed there were baghouse failures in August 2019 with visible emissions and that the construction site next door complained about burning skin and eyes.

FINDINGS FROM INVESTIGATION:

The inspection was conducted in response to a complaint received from the Hazardous Waste Management Program. Because a Hazardous Waste Compliance Evaluation Inspection was completed at Bio-Lab Incorporated on February 27, 2019, the investigation conducted on October 8, 2019 focused on the complaint allegations.

On October 8, 2019, Emilea Reiner (GA EPD), Peter Nguyen (GA EPD), and I arrived at the facility at approximately 9:45 AM. We were received by Thomas Wideman, the Director of Health, Environmental, Safety, and Sustainability. We introduced ourselves, showed our credentials, explained the allegations of the complaint, and proceeded with the investigation. Mr. Wideman showed us the 90-day accumulation area and we inspected each drum's accumulation date. The earliest accumulation date was August 28, 2019. There was one (1) 55-gallon drum that was open (**Violation #1**)(Photograph #1). In addition, there was not adequate space aisle space between the drums (**Area of Concern #1**)(Photograph #2). At the time of the investigation, there was no hazardous waste stored at the facility longer than the 90-day accumulation limit. The facility's hazardous waste manifests from the last 90 days were reviewed and all records seem to be present and in order.

Mr. Wideman informed us that the company was transitioning away from hydrochloric acid and showed us the tanks that were previously used for storing hydrochloric acid. At the time of the inspection, there was no evidence of compromised or leaking tanks. There were small pools of standing rainwater around the tanks.

Peter Nguyen conducted an inspection of the facility's baghouses to address the air quality and baghouse allegations of the complaint.

CONCLUSION:

The hazardous waste allegations in the complaint were unsubstantiated. However, the facility had one violation and one area of concern regarding hazardous waste management. A Notice of Violation/Compliance Status Letter will be sent to the facility from the Land Protection Branch. Peter Nguyen will be responsible for the air inspection report and issuing any enforcement regarding air quality.

RECOMMENDED REFERRAL/FOLLOW-UP:

Please contact Peter Nguyen in the Chemical and Minerals Stationary Source Compliance Unit in the Air Protection Branch at (404) 675-6088 for the air inspection report.

REVIEWED BY: Nichole Rodgers DATE: 11/1/19

Photographs #1 #2 are attached.



Site: Bio-Lab Incorporated	Photograph 1 of 2	County: Rockdale
Date: October 8, 2019	Photographer: Emilea Reiner	
Observation: One (1) open 55-gallon drum stored in the 90-day accumulation area (Violation #1).		



Site: Bio-Lab Incorporated	Photograph 2 of 2	County: Rockdale
Date: October 8, 2019	Photographer: Emilea Reiner	
Observation: Inadequate aisle space in the 90-day accumulation area (Area of Concern #1).		