

US EPA ARCHIVE DOCUMENT



# Romic Environmental Technologies Corporation - Southwest

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## Monitoring and Compliance History of Romic

The Romic facility is located on the Gila River Indian Reservation at 6760 West Allison Road, in the Lone Butte Industrial Park just southwest of Chandler, AZ.



Romic currently operates as a hazardous waste storage and treatment facility that is primarily engaged in recycling of solvents. The Environmental Protection Agency (EPA) seeks comments from the public on Romic's final permit application to continue to store and treat hazardous waste and to expand its operations.

### What is EPA's Inspection and Enforcement Authority?

EPA's authority to inspect and enforce at hazardous waste facilities comes from the Resource Conservation and Recovery Act (RCRA). EPA's inspectors look for compliance with the requirements of RCRA and EPA's hazardous waste regulations. These regulations control operations at hazardous waste storage and treatment facilities, such as Romic.

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### What Does EPA Do During an Inspection?

The primary purpose of an inspection is to ensure that the facility is operated in a safe manner, protective of both human health and the environment. In order to accomplish this, EPA:



- √ **Reviews facility operations**
  - operation of the treatment systems
  - integrity of storage tanks
  - proper storage of wastes
- √ **Reviews facility records**
  - hazardous waste shipping records
  - internal inspection records
  - personnel training records
- √ **Checks for proper implementation of plans**
  - emergency response plan
  - waste analysis plan
  - training plan
- √ **Reviews the wastes managed at the facility**
  - amount of waste received
  - type of waste received

# Romic's Compliance Monitoring History

## How Does EPA Enforce the Law?

EPA may take enforcement action if non-compliance is found at a hazardous waste facility. The four main types of enforcement action are described below:

**A Warning Letter** is a document which requires the facility to correct any potential violations observed by the inspectors during an inspection. It is used when the violations are determined to be minor.

**Civil Administrative Action** is a legal action taken against a facility which typically results in a monetary fine and requires the facility to perform compliance actions.

**Civil Judicial Action** is a legal action taken against a facility which typically results in a monetary fine and requires the facility to perform compliance actions. However, unlike a Civil Administrative Action, these cases are tried in the U.S. court system.

**Criminal Action** is a legal action taken against persons or corporations for criminal violations which may result in imprisonment and/or a monetary fine. In these cases, a grand jury or U.S. Attorney charges the persons or corporations with crimes. An example of a criminal action is deliberately having two sets of records showing different results on the same incident.

## Romic's Inspection History

EPA conducted many Compliance Evaluation Inspections from 1988 to 2001:

11/88	1/91	11/91	12/91
4/92	10/92	11/92	4/93
11/93	4/94	11/94	4/95
3/96	1/97	7/97	12/98
10/01 ( <i>Off-Site Rule Inspection</i> )			

Some of the typical violations that were noted during these inspections include:

- insufficient aisle space
- ▣ storage of ignitable waste less than fifty feet from the property line
- ▣ inaccurate, missing, or incomplete labels
- ▣ failure to make a waste determination
- ▣ incomplete inspection logs
- ▣ failure to comply with the air emission inspection, monitoring and recordkeeping requirements
- ▣ incomplete or outdated information in the contingency plan



## Romic's Inspection History, Cont'd.

Given the size of the facility and the volume of hazardous waste processed through the facility, most of the violations were typical of the violations that EPA notes at other facilities like Romic. All of these violations were either corrected by Romic or were determined not to be violations based on information provided by the facility subsequent to the field inspection.

## Romic's Current Compliance Status

Most recently, Compliance Evaluation Inspections were also conducted at Romic in February 2002, August 2002, April 2003, April 2004, and May 2004. EPA identified a number of potential violations. Some of these potential violations were quickly corrected by the facility shortly after they were noted. Other potential violations were determined not to be violations based on follow-up information provided by the facility. For the remaining potential violations, Romic has provided EPA with additional information.

EPA is currently reviewing Romic's information and results from the sampling actions conducted by EPA in addition to meeting with Romic staff to discuss current potential violations. Once EPA has evaluated all of the information, EPA will determine whether there are actual violations. If there are actual violations, EPA will determine the appropriate enforcement action to correct the violations and to ensure future compliance.