



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

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SEP 07 1999

4WD-RCRA

Mr. Rex Stutchman III  
Environmental Health and  
Safety Specialist  
Manufacturing and Distribution  
Bio-Lab, Inc.  
1700 Old Covington Highway  
Conyers, Georgia 30207

SUBJ: Bio-Lab, Inc.  
Conyers, Georgia

Dear Mr. Stutchman:

Enclosed is a copy of the Environmental Protection Agency's (EPA's) inspection report documenting the results of the July 21, 1999, inspection of the subject facility. This was a Compliance Evaluation Inspection (CEI) and a State lead inspection with EPA oversight for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

No RCRA violations were identified during the inspection. If you have any questions concerning this matter, please contact Denisse Davila at (404) 562-8610.

Sincerely yours,

Jeffrey T. Pallas, Chief  
South Enforcement and  
Compliance Section  
RCRA Enforcement and Compliance  
Branch

Enclosure

cc: Greg Thomas, GA EPD w/encl.

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RCRA COMPLIANCE EVALUATION INSPECTION REPORT

1) Inspector and Author of Report

Denisse Davila  
Environmental Engineer

Waste Management Division  
RCRA Enforcement and  
Compliance Branch  
61 Forsyth Street  
Atlanta, Georgia 30303  
(404) 562-8610

2) Facility Information

Bio-Lab, Inc.  
1700 Old Covington Highway  
Conyers, Georgia

EPA ID #GAD 991 274 820

3) Responsible Official

Mr. Rex Stutchman III  
Environmental Health and  
Safety Specialist  
Manufacturing and Distribution

4) Inspection Participants

Denisse Davila, USEPA  
Rex Stutchman III, Bio-Lab  
Greg Thomas, GA EPD

Date of Inspection

July 21, 1999

6) Applicable Regulations

40 Code of Federal Regulations (C.F.R.) Parts 260 - 265, 268, and 270; Rules Governing Hazardous Waste Management in Georgia.

7) Purpose of Inspection

To conduct an unannounced State lead comprehensive Compliance Evaluation Inspection (CEI) with oversight from EPA to determine the facility's compliance status with the applicable regulations.

8) Facility Description

Bio-Lab, Inc., located in Conyers, Georgia, is a subsidiary of Great Lakes Chemical Corporation. The company which manufactures and markets pool and spa products, employs 400 people at this site. The facility has six (6) active buildings on a 40-acre site.

Bio-Lab is classified as a small quantity generator (SQG) even though the facility operates as a conditionally exempt small quantity generator (CESQG). The facility maintains this status primarily due to isolated instances of hazardous waste generation and also in the event of an accidental spill. RCRA waste primarily consists of paint related waste generated from painting operations for automatic chlorinators and chemical oxygen demand (COD) vials from the laboratory. The used solvent generated from parts washers is non-hazardous.

9) Findings

The storage area for the maintenance and paint shop was inspected and two (2) 20-gallon drums were observed. One of the drums was half-full with paint related waste (D001, D035, F003, F005) and the second drum was empty. According to the facility representative, it takes them one year to fill one (1) 20-gallon drum with hazardous waste. Both drums were closed and labeled with the words "Hazardous Waste". The drum containing hazardous waste was dated as of November 5, 1998. However, it was explained to the facility representative that the drum should be dated once it is full and not when they begin accumulating waste in it. The area was well maintained with no evidence of spills.

At the laboratory, the Bio-Lab accumulates COD vials which may contain mercury and sulfuric acid and therefore are treated as hazardous waste. The COD vials are accumulated in a box which is shipped off for disposal when it is full. At the time of the inspection, there was one box half full with vials located in the laboratory. The box was closed and marked with words identifying its contents. The laboratory was well maintained with no evidence of spills.

Records Review

The hazardous waste manifests and land ban certifications were reviewed for the last three years and appeared adequate. Emergency numbers and procedures were posted near the telephones where hazardous waste is managed or stored.

10) Signed



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Denisse Davila  
Environmental Engineer  
RCRA Enforcement and  
Compliance Branch

August 31, 1999

Date

11) Approval



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Jeffrey T. Rallas, Chief  
South Enforcement and  
Compliance Section

September 7, 1999

Date