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Hazardous Waste Enforcement: U.S. Environmental Protection Agency in Baltimore, Maryland Galvanize Enter into Consent Agreement

05/07/2024

The United States Environmental Protection Agency ("EPA") and Southern Galvanizing Company ("Southern") entered into a March 26th Consent Agreement ("CA") addressing alleged violations of the Federal and Maryland Hazardous Waste Regulations. See Docket No. RCRA-03-2024-0024.

Southern is stated to operate a galvanizing facility in Baltimore, Maryland ("Facility").

The Facility is stated to conduct a hot dip galvanization process on metal for corrosion protection. The primary waste streams are stated to include:

- Hydrochloric acid waste.
- Secondary containment liquid (generated from spills and drips during the galvanizing process).
- Aerosol cans and their contents.
- Acid filter cake waste.

The Facility is stated to have most recently notified as a large quantity generator of hazardous waste. It does not have a RCRA Permit to treat, store, and/or dispose of hazardous waste.

EPA and Maryland Department of Environment inspectors are stated to have conducted a compliance evaluation inspection on September 24, 2019. The CA provides that on the basis of EPA's findings during the inspection and other information Southern provided to EPA after the inspection, it concluded that the Facility had violated certain requirements and provisions of RCRA Subtitle C, 42 U.S.C. §§ 6921-6939(e), and certain federally authorized Maryland regulations.

The alleged violations include:

- Failure to make a hazardous waste determination.
- Operating without a Permit or valid exemption to the permitting requirement or interim status.
- Failure to document daily inspections of hazardous waste tank.
- Failure to maintain and operate the Facility to minimize the possibility of release.

Southern neither admits nor denies the specific factual allegations set forth in the CA.

A civil penalty of \$15,051.00 is assessed.

A copy of the CA can be downloaded [here](#).