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Hazardous Waste Enforcement: Alabama Department of Environmental Management and Saraland Commercial Truck Wash Facility Enter into Consent Order

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The Alabama Department of Environmental Management (“ADEM”) and Qualawash Holdings, LLC (“QH”) entered into a Consent Order (“CO”) addressing alleged violations of the Alabama Administrative Code addressing hazardous waste.

The CO provides that QH operates a commercial truck wash in Saraland, Alabama.

Representatives of ADEM’s Industrial Hazardous Waste branch are stated to have conducted a Compliance Evaluation Inspection of the QH facility on December 7, 2023. The Compliance Evaluation Inspection and a review of the facility’s compliance is stated to have indicated the following:

- Failure to keep close 23 satellite accumulation containers of hazardous waste located in the central accumulation area.
- Failure to mark or label 25 satellite accumulation containers of hazardous waste with the words “hazardous waste”.
- Failure to mark or label 24 satellite accumulation containers of hazardous waste with an indication of the hazards of the contents.
- Exceedance of the allowed volumes of hazardous waste in satellite accumulation.
- Failure to adequately maintain the containment system for the central accumulation area.
- Failure to adequately restrict access to the central accumulation area.
- Failure to maintain signage containing a legend “danger – unauthorized personnel keep out”.
- Failure to mark or label 5 containers of hazardous waste with an accumulation start date.
- Failure to mark or label 2 containers of hazardous waste with the appropriate EPA hazardous waste numbers.
- Storage of hazardous waste on site for more than 90 days without a permit.
- Failure to submit an ADEM form 8700-12 annually.
- Failure to submit a copy of the most recent revision of the contingency plan to local emergency responders.
- Failure to develop a quick reference guide for the contingency plan.

QH neither admits nor denies ADEM’s contentions.

Further, QH has submitted a written response to ADEM's notice of violation stating that all of the alleged violations have been fully resolved.

A civil penalty of \$17,500.00 is assessed.

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