

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	7/31/2023 – 8/2/2023	
Media Program:	Resource Conservation and Recovery Act (RCRA)	
Regulatory Program(s)	RCRA Treatment Storage and Disposal Facility and Large Quantity Generator (LQG) of Hazardous Waste	
Company Name:	Clean Harbors Environmental Services, Inc.	
Facility Name:	Clean Harbors Environmental Services, Inc. (CHESI)	
Facility Physical Location:	2027 Independence Pkwy S, #100	
(city, state, zip code)	LaPorte, TX 77571	
Mailing address:	2027 Independence Pkwy S	
(city, state, zip code)	LaPorte, TX 77571-9808	
County/Parish:	Harris	
Facility Phone Number	281-930-2412	
Facility Contact:	Bruce Riffel	Sr. Environmental Compliance Manager
	riffel.bruce@cleanharbors.com	
FRS Number:	NA	
Identification/Permit Number:	Texas Solid Waste Registration #50089	
Media Identifier Number:	TXR000085319	
NAICS:	562998 - All Other Miscellaneous Waste Management Services	
SIC:	7699 - Repair Shops and Related Services	
Personnel participating in inspection:		
Dedriel Gardner	EPA R6/ECD-SR	Lead Inspector, Environmental Engineer
Bruce Riffel	Clean Harbors Deer Park	Sr. Environmental Compliance Manager
Michael Robbins	CHESI Tank Wash	Branch Manager
Jason Jones	CHESI Tank Wash	Supervisor
Randolph Jackson	Clean Harbors Deer Park	Lab Manager
Kim Bravenec	Clean Harbors Deer Park, Transportation Group	Waste Receiving Supervisor
Steven Banister	Clean Harbors Deer Park	Incinerator Manager II
Daniel Tauriello (exit only)	Clean Harbors Deer Park	General Manager
EPA Lead Inspector Signature/Date		
	Dedriel Gardner	Date
Supervisor Signature/Date		
	Debra Pandak	Date

Section I – INTRODUCTION

PURPOSE/PROCEDURES OF THE INSPECTION

On July 31, 2023 – August 2, 2023, I, Dedriel Gardner, conducted an unannounced inspection of the Clean Harbors Environmental Services, Inc. facility (CHESI) located at 2027 Independence Pkwy S, #100, in LaPorte, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). The facility was targeted due to its operating as a transporter transfer facility located next to a designated treatment, storage, and disposal (TSD) facility. I presented my credentials to Bruce Riffel (Sr. Environmental Compliance Manager) and informed him that I was there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. I discussed EPA Region 6's Confidentiality Notice (40 CFR Section 2.203) for any, potential Business Confidentiality Information claims by CHESI. I informed him that the inspection would include a discussion of facility operations, waste generation, and waste management; a visual inspection of the facility including waste generation and management areas; and a review of related waste management records.

At the conclusion of the inspection on August 2, 2023, I conducted a closing conference with Messrs. Riffel, Robbins, and Tauriello. I informed the facility representatives that I would not be discussing all the provisional areas of concern (AOCs) at this time as EPA will be reviewing additional information regarding how the site should be regulated. However, some potential AOCs identified during the inspection, that may be applicable depending on those decisions, were briefly discussed and provided in Section III.

This report serves as documentation of all onsite activities and observations during the inspection of the CHESI facility. I discussed using the same EPA electronic secure online drive set up during the April 19, 2023, Clean Harbors Deer Park (CHDP) inspection to upload documents during and after this inspection. Mr. Riffel stated that he would share the online drive set up with Mr. Robbins and/or upload the information for him. Also, 151 photographs were taken during the inspection to document onsite observations. A subset of the photographs is used that best present the observation with minimal duplication. A map of all 151 Photograph locations and direction taken is included in Appendix 1.

FACILITY DESCRIPTION

Facility Representatives

Bruce Riffel, CHDP Sr. Environmental Compliance Manager, acted as the facility representative and provided the information throughout this inspection unless stated otherwise. During an April 19, 2023, inspection of CHDP, I was informed that this 10-day transfer area was not a part of CHDP. Therefore, I asked Mr. Riffel how he can represent this transfer facility that he is not a part of. He stated that the CHESI transportation branch has their own compliance person, but he does not know who that is. Mr. Riffel stated that the compliance personnel are regional and are not always near their facilities. Therefore, it is Clean Harbors' policy that if needed, Mr. Riffel as a compliance person can represent this transfer facility since he is located at the CHDP facility next to the CHESI area. Mr. Riffel stated that he can provide the information for the 10-day transfer operation, but not the tank wash operation as their employees are located onsite and available for interviewing.

I asked Michael Robbins, CHESI Tank Wash Branch Manager, if I needed to repeat the inspection entry procedures to him if they consider themselves separate from CHDP. Mr. Robbins stated no, and that Mr. Riffel would be the person to receive the entry information. It should be noted that Mr. Riffel is listed as the facility contact for the 10-day transfer area in RCRAInfo.

General Information

CHESI is the parent company of CHDP according to the Facility Audit Package provided during the April 19, 2023, EPA inspection of CHDP. The package was prepared for auditors and includes a history of the facility, general information, plant operations, technical services, environmental affairs, and health and safety information.

Three separate CHESI companies operate onsite and have registered with the state of Texas. They are as follows:

- CHESI Transfer – Conducts hazardous waste and used oil transportation and uses the Texas site as a 10-day transfer area. The Clean Harbors Corporate Headquarters is in Norwell, Massachusetts. CHESI is registered under an EPA ID# MAD039322250 with no physical address and Norwell, Massachusetts as the primary address. Mr. Riffel stated that the physical address used for CHESI Transfer is the same used for the permitted CHDP site. Therefore, they are not able to enter it because you can have only one address for one EPA ID number and cannot have a Texas address for a Massachusetts EPA ID number. Mr. Riffel provided the Texas registration information for this site under EPA ID# MAD039322250 (see Appendix 2). It is registered in Texas as RN100613595/RN106254295 and CN600322796. Therefore, CHESI Transfer uses the MAD039322250 EPA ID number. The Massachusetts company last notified on November 5, 2019, as a non-generator of hazardous waste and a transporter of hazardous waste and used oil. Mr. Riffel stated that this Texas transfer operation has been operating onsite as such for years.
- CHESI Tank Wash – Conducts container washing onsite as a transfer facility. CHESI Tank Wash and CHDP both use the 2027 Independence Pkwy S, LaPorte, TX 77571 address. However, Mr. Riffel stated that since you can only have one address per EPA ID number, he made it suite #100 for this address to obtain a separate EPA ID number (TXR000085319). Mr. Robbins and Mr. Riffel stated that they initially notified on June 11, 2020, when the facility was being installed and subsequently on November 4, 2021, when they started operating. They notified as a Large Quantity Generator (LQG) of D002 hazardous waste and a transfer facility. Mr. Riffel provided and uploaded during the inspection Texas registration documents regarding the latest notification for CHESI Tank Wash (see Appendix 2). Mr. Riffel stated that the tank wash part of CHESI notified as a separate site because of financial reasons, i.e., the washing side of the business will be profit generating as opposed to the transporting side.
- CHDP – A RCRA permitted TSD facility that specializes in incineration of hazardous waste and uses the site for permitted container storage. The facility has been in operation since the early 1970s. CHDP uses the address of 2027 Independence Pkwy S, LaPorte, TX 77571. The EPA ID number is TXD055141378.

In addition, CHDP has a transportation group onsite that works with all three companies processing manifests and checking-in the drivers, contractors, and visitors. They also conduct inspections on the incoming loads when the drivers check in.

A facility layout was provided during the CHDP April 19, 2023, inspection that I color coded showing the areas used by each CHESI company (see Appendix 3). I asked Messrs. Riffel, Robbins, and Jackson to verify the color coding which they did. Also, during the inspection Mr. Riffel provided a deed map from the permit Part B application (see Appendix 3). It states that the property owner is Clean Harbors, Inc., but the facility representatives were not sure if this was currently accurate. In addition, the west property line was unclear. This is because the site changed about two years ago, and part of the west security fence was removed, and a modular building was added for the CHDP's transportation group offices. Mr. Riffel stated he would provide information regarding the site ownership and west property line.

Process/Operations Descriptions

See Appendix 4 for more detailed descriptions of processes/operations for the three CHESI companies.

Section II - OBSERVATIONS

I conducted the onsite inspection during business hours on July 31, 2023 – August 2, 2023. During the inspection, the facility was conducting normal operations. I visually inspected the facility to include the transfer storage and sampling areas, tank wash and drum storage areas, permitted container storage area, and transportation office. Also, I reviewed facility records pertaining to the facility's RCRA applicability and compliance requirements, specifically regarding the management of hazardous waste received at the 10-day transfer facility and tank washing activities.

This section provides an abbreviated description of my onsite activities (see Appendix 5 for Daily Summaries). Appendix 1 provides a representative portion of the 151 photographs taken during the inspection and a map of all 151 Photographs locations and directions. Unless otherwise specified, the statements cited in this section reflect those claims made by Mr. Riffel or documents reviewed during the inspection.

Observations of Wastes Generated Onsite

Based on my discussions with facility personnel and documents reviewed, Appendix 6 is a waste table that by waste stream name, addresses generation process, facility's hazardous waste determination, generation rate, on-site management, off-site management, and related AOCs. Please note that more detailed process information related to the wastes generated is included in Appendix 4.

Based on known generation rates of hazardous waste at the time of the inspection, all three companies combined would be an LQG. Independently, CHDP and CHESI Tank Wash are both Large Quantity Generators (LQG), and CHESI Transfer a Small Quantity Generator (SQG).

Mr. Riffel and Mr. Robbins stated that all wastes generated onsite, including the general trash, are managed as hazardous waste. All wastes are picked up from the satellite accumulation areas at the CHESI and CHDP locations by CHDP personnel daily for incineration. Mr. Riffel stated that CHDP does not track or log any of the wastes collected from the satellite areas as it is all incinerated as hazardous waste.

Also, CHESI as an importer of hazardous waste, is subject to 40 CFR Part 262, Subpart H [30 TAC §335.58]. I asked for sample documents related to one of the import shipments for review.

Observations of Waste Received from Offsite and Other Regulatory Requirements

CHESI Transfer

- Less Than 10-Day Storage Areas Conditions – I observed numerous containers of off-site generated hazardous waste being stored less than 10 days in the three container storage areas (i.e., roll-offs, tankers, and trailers). Also, I observed cracks and spalling in these areas. See Photos 46, 49, 112, 114, and 120. **(AOC #1.a)**.
- Security
 - About two years ago, part of the west security fence was removed, and the west property line and site ownership were unknown as stated above in Section I, Facility Description.
 - The north security fence has three openings of which two have gates that remain open. The other opening near the transportation office has no gate and I observed no warning signs near it (see Photos 116 - 118, 129, 136 and 139). Also, I observed warning signs posted on the north, south, and east fences but spaced far apart (see Photos 18, 100, 108, 112, 114, and 125). **(AOC #1.d)** Mr. Riffel stated that they have ordered more warning signs to be posted around the facility.
 - There are security cameras monitoring this entire site, although no one watches the cameras live. Steve Banister (Incinerator Manager II) provided photos of the camera angles (see Appendix 7). He stated that the recordings can be reviewed at any time back to a month and then they may be deleted. Also, employees carry 2-way radios, and someone is working at the facility 24 hours, seven days per week, as trucks enter to be weighed and leave.
- Contingency Plan/Training – Mr. Riffel stated that CHESI Transfer is a part of CHDP's contingency plan and training program. I requested for review training documents for three employees including Kim Bravenec, one waste sampler, and one check-in inspector.
- Inspections – Inspections are conducted on the roll-offs and tankers when they initially arrive onsite by the CHDP Transportation Group. The trailers are inspected on the outside and not the individual containers (e.g., drums) inside. I requested inspection records of the transfer areas for review.

CHESI Tank Wash

- Contingency Plan/Training
 - I requested the training documents (i.e., completed training and job descriptions) for four employees that handle hazardous waste and sign the manifests.
 - Mr. Riffel and Mr. Robbins stated that they operate under CHDP's contingency plan.

CHDP

- Permitted Storage Area – The Waste Receiving Pad is a large, permitted roll-off storage area with a drainage collection area and sump.

- I asked Mr. Riffel why CHDP still manages this permitted container storage area. He stated that he did not know as it was probably managed as such from a long time ago and was never changed.
- I observed in the drainage collection area cracks in a wall along with weeds, algae, residue, accumulated liquid, and little fish swimming (see Photos 72, 75, 77, and 78). Also, I observed a crack on the south end, stains as stated below, and residue throughout the containment that Mr. Riffles stated was dirt being blown/tracked in (see Photos 66, 75 - 77, 122, 125, and 135). **(AOC #3.a)** During the inspection, CHDP started cleaning out this containment area (see Photo 140).
- I observed various roll-offs of hazardous waste and polychlorinated biphenyls (PCBs) wastes being stored. Ms. Bravence stated that she did not have the manifests for these containers as they had been accepted by CHDP.
- I selected the following roll-offs to review related manifests and waste profiles:
 - Container #VB12007 – randomly selected for tracking.
 - Container #CHVB0684 – leaking, labeled PCBs, and believed to be empty (see Photos 66 and 70). Since it was leaking, I noted it as a concern to verify that it did not contain a hazardous waste since roll-offs are reused and PCBs could be mixed with hazardous waste. **(AOC #3.b)** A catch container was placed underneath to catch any leaks/spills until cleaned up (see Photos 135).
 - Container #RT-251988 – labeled with manifest #024041343JJK and randomly selected for tracking.
 - Container #CHVB0230 – dated 5/8/23 and labeled construction debris, but I observed a stain underneath it (see Photos 75 and 76). **(AOC #3.c)**
 - Container labeled with Manifest #018168736FLE – I observed a stain underneath it (see Photos 122 and 124). **(AOC #3.c)**

Mr. Riffel stated that they started removing the containers that appeared to be leaking (see Photo 133).

- CHDP Transportation Group

- The Transportation Group signs the incoming manifests for both CHESI Transfer (MAD039322250) and CHDP (TXD055141378). They also create manifests and drum labels for CHESI Tank Wash.
- Tankers that are manifested to CHDP for incineration may be sent to CHESI Tank Wash, if after unloading, they contain heels or need cleaning.
 - Two manifests are completed if the tankers are RCRA empty:
 - The original incoming manifest by the generator to CHDP.
 - The manifest for the drums of heels generated by CHESI Tank Wash to CHDP.

The generator (the customer), transporter (CHESI – MAD039322250), and designated facility (CHDP – TXD055141378) are listed the same on both above manifests. Ms. Bravenec provided the example shown in Appendix 4B of an empty tanker that generated heels returned to CHDP.

 - Three manifests are completed if the tankers are not RCRA empty:
 - The original incoming manifest by the generator to CHDP.
 - The rejected manifest of heels to CHESI Tank Wash.

- The manifest for the drums of heels generated by CHESI Tank Wash to CHDP.

The generator (the customer), transporter (CHESI – MAD039322250), and designated facility (CHDP – TXD055141378) are the same on all three manifests. CHESI Tank Wash signs the rejected manifest and drums of heels manifest as a transporter (CHESI – MAD039322250). However, the rejected manifest is kept by CHESI Tank Wash and not returned to CHDP (i.e., never receives a signature of acceptance from a designated facility), although CHDP receives the drums of heels manifest for signature. I asked for examples of this process to be provided. Ms. Bravenec stated that they do not keep track of the RCRA non-empty manifests. They would have to go on memory or sort through the manifests since the drum of heels manifests look the same as any offsite generator customer.

Section III – AREAS OF CONCERN

I conducted a closing conference with Messrs. Riffel, Robbins, and Tauriello on August 2, 2023. During the closing conference, I reviewed the outstanding document requests stated in the Daily Summaries and provided Mr. Riffel and Mr. Robbins a list (see Appendix 8). I explained the right of CHESI to assert a CBI claim for records requested by the EPA and presented a copy of EPA Region 6's Confidentiality Notice (40 C.F.R. §2.203). Mr. Tauriello made no CBI claims for CHDP and CHESI Transfer, and Mr. Robbins made no CBI claims for CHESI Tank Wash (see Appendix 9 for the signed CBI Notices).

During the closing conference, I informed the facility representatives that I would not be discussing all the provisional AOCs at this time as EPA will be reviewing additional information regarding how the site should be regulated. This included:

- Whether it is operating as one site (i.e., as a part of CHDP's permitted TSD facility), or as three independent companies on one site (CHDP, CHESI Transfer, and CHESI Tank Wash).
- Whether the site meets the 10-day transfer facility criteria regarding being located contiguously to the designated TSD facility and tank washing of RCRA non-empty containers.

Even so, I discussed some potential AOCs that may be applicable whether they are regulated as one permitted site or independently. They included the following; however further EPA review may change or add to these potential AOCs:

1. CHESI Transfer

- a. **AOC #1.a** – I observed cracks and spalling in the less than 10-day roll-off, tanker, and trailer storage areas. [40 CFR 264.175(b)(1) for a permitted facility]
- b. **AOC #1.b** – I observed one 1-cubic yard satellite accumulation box (containing less than 55-gallons) of spent PPE opened and not labeled with the indication of hazards. [40 CFR 262.15(a)(4) and (5) for a SQG or LQG]
- c. **AOC #1.c** – CHESI Transfer did not notify as a generator of hazardous waste. [30 TAC 335.6 for a SQG or LQG]

- d. **AOC #1.d** – I observed insufficient warning signs posted. [30 TAC 335.94 for a transfer facility or 40 CFR 265.14(c) for a permitted facility]

2. CHESI Tank Wash

- a. **AOC #2.a** – I observed hazardous waste determination concerns for the following waste streams [30 TAC 335.504 (40 CFR 262.11) for all generators]:
 - i. Heel flushes to verify representativeness.
 - ii. Wastewater to verify as no waste profile was provided.
 - iii. Containment residue to verify as no waste profile was provided.
 - iv. General trash to verify as no waste profile was provided.
 - v. Spent carbon to verify hazardous waste management as co-generated waste.
- b. **AOC #2.b** – I observed the following container related concerns
 - i. Hazardous waste storage containers not dated, not labeled “Hazardous Waste” and not labeled with the indication of hazards. [40 CFR 268.50(a)(2) for a permitted facility or 40 CFR 262.17(a)(5)(i) for a LQG]
 - ii. One opened storage dumpster of hazardous waste. [40 CFR 262.17(a)(1)(iv) for a LQG]
 - iii. Two opened unlabeled 55-gallon satellite accumulation drums of hazardous waste. [40 CFR 262.15(a)(4) and (5) for a LQG]
 - iv. Potential incompatibles being stored without any separation. [30 TAC 335.94(a)(6) ref 265.177(c) for a transfer facility; 40 CFR 264.177(c) for a permitted facility; and 40 CFR 262.17(a)(1)(vii)(C) for a LQG]
 - v. At least 144 drums of hazardous waste being stored over 10 days. [30 TAC 335.94(a) for a transfer facility]
 - vi. Cracks and spalling in the Central Storage Area that appeared uncoated/unsealed. [40 CFR 264.175(b)(1) for a permitted facility]
- c. **AOC #2.c** – I observed the following concerns regarding the four hazardous waste storage tanks:
 - i. The tanks were not labeled “Hazardous Waste”. [40 CFR 262.17(a)(5)(ii)(A) and (B) for a LQG]
 - ii. No tank assessments or certifications provided for the storage tanks. [40 CFR 265.192 for a LQG]
 - iii. The secondary containment walls had folded over/collapsed. [40 CFR 265.193 for a LQG]
 - iv. No tank controls to prevent spills and overflows from the hazardous waste tank systems.. [40 CFR 265.194 for a LQG]
 - v. No documented tank daily inspections or records to show the tanks are emptied once every 90 days provided. [40 CFR 265.195 and 40 CFR 262.17(a)(5)(ii)(C) and (D), for a LQG]
 - vi. Liquid and solid residue accumulated in the secondary containment that had not been cleaned in about a month. [40 CFR 265.196 for a LQG]
 - vii. There appears to be no routine sampling or process in place to account for preventing incompatibles mixing. [40 CFR 265.199 for a LQG]
 - viii. The RCRA Subpart CC air emissions requirements were believed to be addressed when they obtained their CAA permit by rule (PBR), however no documentation was provided. [40 CFR 262.17(a)(2) ref 265.1090 for a LQG]
- d. **AOC #2.d** – During the tanker cleaning process, waste sprays from the tankers and the hazardous waste tank ancillary equipment (duct taped hoses) and lands onto the concrete pad in between the wash pad berm and tank containment liner. The concrete

has seams that are cracked/spalling and have weeds growing in between. [40 CFR 264.31 for a permitted facility and 40 CFR 262.17(a)(6) ref 262.251 for a LQG]

- e. **AOC #2.e** –The wash bay pad concrete floor is used to convey hazardous waste from the pad to a sump. The waste is pumped from the sump into the hazardous waste tanks. I observed liquid puddles and cracks in the floor that is used to convey the hazardous waste to the sump. Further review is needed to determine how this wash bay pad unit may be regulated and/or if any potential releases of hazardous waste or hazardous waste constituents could occur.

3. CHDP Permitted Facility

- a. **AOC #3.a** – I observed cracks in the Waste Receiving Pad's drainage collection area wall along with weeds, algae, residue, accumulated liquid, and little fish swimming. [40 CFR 264.175(b) for a permitted facility]
- b. **AOC #3.b** – I observed a roll-off labeled PCBs leaking that needed its non-hazardous waste determination verified since it was believed to be empty. Roll-offs are reused, and PCBs could be mixed with hazardous waste. [30 TAC 335.504 (40 CFR 262.11) all generators]
- c. **AOC #3.c** – I observed two storage containers on the Waste Receiving Pad with stains underneath. [40 CFR 264.171 for a permitted facility]

Section IV – FOLLOW UP

Further EPA review will determine how the site should be regulated. Additional actions taken by CHESI to resolve any areas of concern were documented by CHESI with other documentation and submitted to the EPA via the electronic secure online drive. Also, any information received from CHESI after the inspection was received via the secure online drive and email. These documents are accessible by the EPA Enforcement Officer for review. The following documents were uploaded during and after the inspection on August 3-7, 2023:

- Manifests with related WINWEB information
- Training Documents/Job Descriptions
- NOR Related documents
- Waste Determinations
- Safety Data Sheets
- Example of Rejected Heels to CHESI Tank Wash
- Selected Containers in Storage Related Manifest Documents
- SOP Cover Sheets and Table of Contents
- Container Inspections
- Sample Import Documents
- RCRA Permit Documents
- Partial Inventory for the Drums of Heels Flushes (also provided during inspection)
- Photo of hazardous waste Tank Containment After Cleaning
- Heels Wash Tickets and Manifests
- Wastewater Outbound Manifests

On August 3, 2023, Mr. Riffel emailed the following:

- The date the Transportation Group moved into the current offices.
- The ownership information regarding the CHESI site and its property boundary.

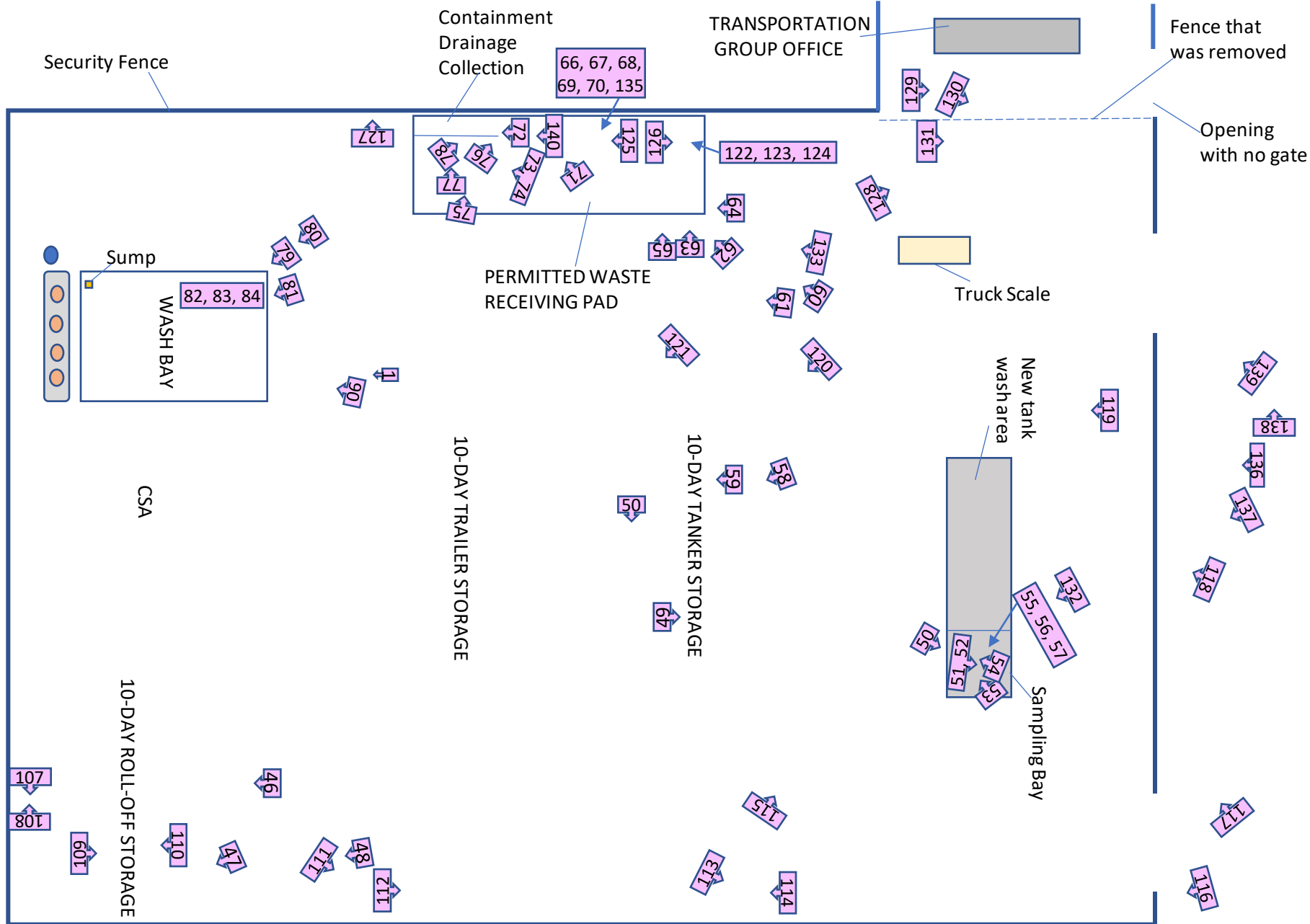
Section V – LIST OF APPENDICES

- Appendix 1 - Photograph Log – Includes Map/Table of All 151 Photo Taken and Photo Log of 79 Photos Referenced in the Report
- Appendix 2 - Texas Registration Documents for CHESI Transfer and CHESI Tank Wash
- Appendix 3 - Facility Layouts and Part B Permit Application Deed Map
- Appendix 4 - Descriptions of Processes/Operations
- Appendix 4A - Example of a Tank Wash Completion Email with Wash Ticket and an Empty Tanker that Generated Heels
- Appendix 4B - Example Manifest of an Empty Tanker that Generated Heels Returned to CHDP
- Appendix 5 - Daily Summaries
- Appendix 6 - Waste Table
- Appendix 6A - Partial Inventory for the Drums of Heels Flushes
- Appendix 7 - Security Camera Photo Angles
- Appendix 8 - List of Requested Documents
- Appendix 9 - Signed CBI Notices

Appendix 1

Photograph Log -

Includes Map/Table of All 151 Photos Taken and
Photo Log of 79 Photos Referenced in the Report



CHESI 2720 Independence Pkwy S, Suite #100, LaPorte, TX – PHOTO LOG MAP

7/31/23 – 8/2/23 RCRA Inspection - Approximate locations and directions of photos taken.



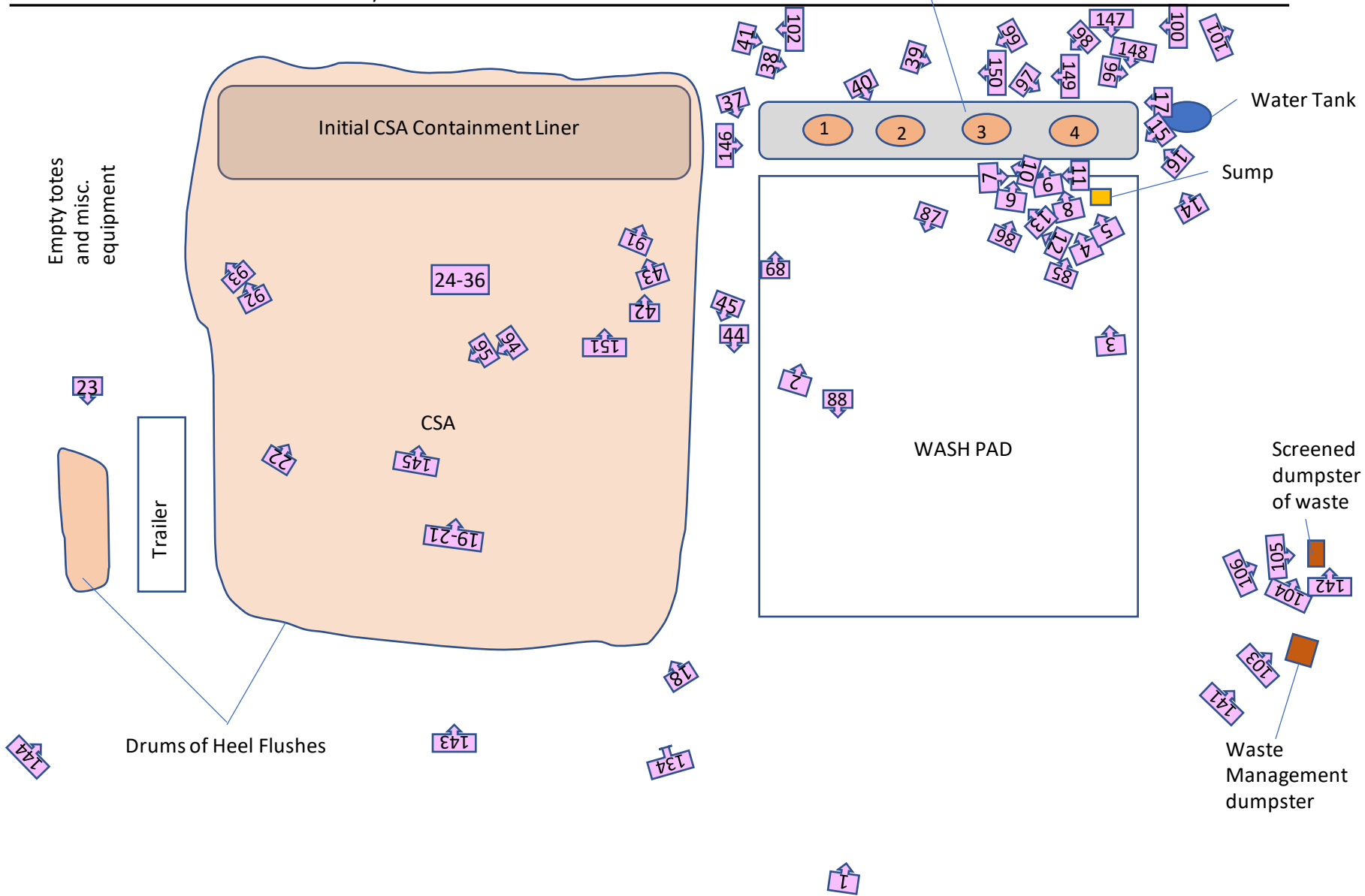
- Photo # and Direction



Not to Scale

Security Fence

4 HW Tanks in Containment Liner



Close-up of Tank Wash Area

CHESI 2720 Independence Pkwy S, Suite #100, LaPorte, TX – PHOTO LOG MAP

7/31/23 – 8/2/23 RCRA Inspection - Approximate locations and directions of photos taken.



- Photo # and Direction



Not to Scale

Facility Name / City: Clean Harbors Environmental Services, Inc.
2027 Independence Pkwy S, #100
LaPorte, Texas 77571

Facility ID #: TXR000085319

Date : July 31, 2023 - August 2, 2023

Image Numbers: 151

Photographer: Dedriel Gardner

Type of Camera: Olympus; Model #: Stylus 720SW; Serial #: A93545595.

Digital Recording Media: Flashcard

All digital photos were copied by: Dedriel Gardner on July 31, 2023 - August 2, 2023.

All digital photos were copied to: EPA electronic secure online drive by Dedriel Gardner

Original copy is stored in: Digital photos were downloaded to EPA electronic secure online drive all by Dedriel Gardner.

No changes were made in the original image files prior to storage on the EPA EPA secure electronic one drive .

Comments: Camera difficulties with date/time stamp for photos #136 - #151 taken on 8/2/2023. Also see included maps of all 151 Photograph locations and direction taken.

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
1	1	1	CHESI Tank Wash Area - Wash pad on concrete pad with berm and 4 HW tanks with no HW labels in background.	S	7310001	1:50 PM	7/31/2023
2	2	2	CHESI Tank Wash Area - Wash pad with 4 HW tanks in background with cloudy level sight glass tubes (pink arrow). Labeled Waste Water and not HW. Liquid on pad from wash down. Sump located on right side of photo (blue arrow).	SW	7310002	1:53 PM	7/31/2023
3	3	3	CHESI Tank Wash Area - Wash pad sump close up. Liquid on pad from wash down. Residue and glove observed outside of west containment berm. Open, unlabeled plastic drum approximately full of spent PPE/general trash (yellow arrow), poor condition drum empty (green arrow), and black drum empty.	S	7310003	2:03 PM	7/31/2023
---	Not in report	4	CHESI Tank Wash Area - Close-up of two of the HW tanks with no HW labels and cloudy level sight glass tubes (pink arrow). Residue observed in liner. Open, unlabeled plastic drum approximately full of spent PPE/general trash (yellow arrow), poor condition drum empty (green arrow), and black drum empty.	SE	7310004	2:03 PM	7/31/2023
---	Not in report	5	CHESI Tank Wash Area - Wash pad sump close up with sheen in liquid around and in sump.	SE	7310005	2:03 PM	7/31/2023
4	6	6	CHESI Tank Wash Area - Close-up of residue and liquid puddles inside and outside of the 4 HW tank secondary containment liner. Also, footprints in the residue outside the liner. Part of the liner wall was collapsed.	SW	7310006	2:03 PM	7/31/2023
---	Not in report	7	CHESI Tank Wash Area - Close-up of residue and liquid puddles inside and outside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed.	W	7310007	2:03 PM	7/31/2023
---	Not in report	8	CHESI Tank Wash Area - Close-up of residue and liquid puddles inside the 4 HW tank secondary containment liner.	SE	7310008	2:04 PM	7/31/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
5	9	9	CHESI Tank Wash Area - Close-up of inside PPE/general trash open unlabeled drum shown in Photo 3.	SE	7310009	2:04 PM	7/31/2023
---	Not in report	10	CHESI Tank Wash Area - Residue inside the 4 HW tank secondary containment liner and inbetween the liner wall and the wash pad's berm. Hoses with duct tape used to convey HW into the HW tanks (blue arrows).	SE	7310010	2:05 PM	7/31/2023
6	11	11	CHESI Tank Wash Area - Residue inside the 4 HW tank secondary containment liner and in between the liner wall and the wash pad's berm. Hoses with duct tape used to convey HW into the HW tanks (blue arrows).	E	7310011	2:05 PM	7/31/2023
7	12	12	CHESI Tank Wash Area - Close-up of HW tanks diaphragm pump and hoses with duct tape (blue arrows).	SE	7310012	2:06 PM	7/31/2023
8	13	13	CHESI Tank Wash Area - Close-up of HW tanks diaphragm pump hose with duct tape (blue arrows).	SE	7310013	2:06 PM	7/31/2023
9	14	14	CHESI Tank Wash Area - Residue and liquid puddles inside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed. L-shaped angle braces located near liner wall where collapsed.	SE	7310014	2:07 PM	7/31/2023
---	Not in report	15	CHESI Tank Wash Area - Close up of residue and liquid puddles inside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed.	NE	7310015	2:07 PM	7/31/2023
10	16	16	CHESI Tank Wash Area - Close up of residue and liquid puddles inside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed. Some of the liquid observed on top of the liner wall that collapsed. L-shaped angle braces located near liner wall where collapsed. Weeds growing in and around seams of concrete pad the liner sits on.	SE	7310016	2:07 PM	7/31/2023
11	17	17	CHESI Tank Wash Area - Close up of residue and liquid puddles inside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed. Weeds growing in seams of concrete pad the liner sits on.	E	7310017	2:07 PM	7/31/2023
12	18	18	CHESI Tank Wash Area - CSA - Numerous 55-gallon drums full to partially full of heel flushes labeled as HW to be sent to CHDP. Label was the yellow/white label with a partial date of month and day except for one label that had no date. No white CHDP labels except for 6 drums. South security fence in background of which some drums labeled as ignitable (D001) and reactive (D003) are being stored within 50 ft.	SE	7310018	2:09 PM	7/31/2023
---	Not in report	19	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 7/13 on a drum shown in Photo 18.	SW	7310019	2:11 PM	7/31/2023
---	Not in report	20	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 7/12 on a drum shown in Photo 18.	SW	7310020	2:11 PM	7/31/2023
---	Not in report	21	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 7/4 on a drum shown in Photo 18.	SW	7310021	2:12 PM	7/31/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
13	22	22	CHESI Tank Wash Area - CSA - Numerous 55-gallon drums full to partially full of heel flushes labeled as HW to be sent to CHDP. Label was the yellow/white label with a partial date of month and day except for one label that had no date. No white CHDP labels except for 6 drums. South security fence in background of which some drums labeled as ignitable (D001) and reactive (D003) are being stored within 50 ft.	SW	7310022	2:12 PM	7/31/2023
14	23	23	CHESI Tank Wash Area - CSA - Part of the numerous 55-gallon drums full to partially full of heel flushes labeled as HW to be sent to CHDP, except approximately 14 drums with no labels at the end of the row.	N	7310023	2:12 PM	7/31/2023
---	Not in report	24	CHESI Tank Wash Area - CSA - Close up of a D003 HW label dated 7/10 on a drum shown in Photo 18.	SW	7310024	2:12 PM	7/31/2023
15	25	25	CHESI Tank Wash Area - CSA - Close up of a D001/D003 HW label dated 7/7 on a drum shown in Photo 18.	SW	7310025	2:13 PM	7/31/2023
---	Not in report	26	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 7/7 on a drum shown in Photo 18.	SW	7310026	2:13 PM	7/31/2023
---	Not in report	27	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 7/6 on a drum shown in Photo 18.	SW	7310027	2:14 PM	7/31/2023
---	Not in report	28	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 6/30 on a drum shown in Photo 18.	SW	7310028	2:14 PM	7/31/2023
---	Not in report	29	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 6/28 on a drum shown in Photo 18.	SW	7310029	2:14 PM	7/31/2023
16	30	30	CHESI Tank Wash Area - CSA - Close up of a D003 HW label dated 6/21 on a drum shown in Photo 18.	SW	7310030	2:15 PM	7/31/2023
---	Not in report	31	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 6/2 on a drum shown in Photo 18.	SW	7310031	2:15 PM	7/31/2023
17	32	32	CHESI Tank Wash Area - CSA - Close up of a ignitable CHDP label dated 7/3/23 on a drum shown in Photo 18.	SW	7310032	2:15 PM	7/31/2023
18	33	33	CHESI Tank Wash Area - CSA - Close up of a D001 HW label not dated on a drum shown in Photo 18.	SW	7310033	2:15 PM	7/31/2023
---	Not in report	34	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 6/1 on a drum shown in Photo 18.	SW	7310034	2:16 PM	7/31/2023
---	Not in report	35	CHESI Tank Wash Area - CSA - Close up of a D001 HW label dated 6/1 on a drum shown in Photo 18.	SW	7310035	2:16 PM	7/31/2023
19	36	36	CHESI Tank Wash Area - CSA - Close up of a D003 HW label dated 5/20 on a drum shown in Photo 18.	SW	7310036	2:16 PM	7/31/2023
---	Not in report	37	CHESI Tank Wash Area - East side of wash pad where spill kit in yellow drum and products are stored in white drums and super sacks of carbon. Includes cleaning compound Meta-Phos (corrosive, phosphoric acid) (blue arrow).	NW	7310037	2:17 PM	7/31/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
20	38	38	CHESI Tank Wash Area - 4 HW tanks and water tank. Weeds growing in and around concrete seams that the HW tank secondary containment liner sits on. Liquid stains on concrete next to liner.	NW	7310038	2:17 PM	7/31/2023
---	Not in report	39	CHESI Tank Wash Area - 2 HW tanks and water tank. Weeds growing in and around concrete seams that the HW tank secondary containment liner sits on.	NW	7310039	2:17 PM	7/31/2023
---	Not in report	40	South edge of liner with residue outside.	NW	7310040	2:17 PM	7/31/2023
---	Not in report	41	CHESI Tank Wash Area - 4 HW tanks and water tank. Weeds growing in and around concrete seams that the HW tank secondary containment liner sits on. Liquid stains on concrete next to liner.	NW	7310041	2:18 PM	7/31/2023
21	42	42	CHESI Tank Wash Area - CSA - Close up of cracks and spalling along concrete seams in area.	S	7310042	2:18 PM	7/31/2023
---	Not in report	43	CHESI Tank Wash Area - CSA - Close up of cracks and spalling along concrete seams in Photo 42.	SE	7310043	2:18 PM	7/31/2023
22	44	44	CHESI Tank Wash Area - CSA - Close up of cleaning compound, Meta-Phos (corrosive, phosphoric acid), shown in Photos 37 and 45.	N	7310044	2:18 PM	7/31/2023
23	45	45	CHESI Tank Wash Area - East side of wash pad next to CSA where products are stored in white drums and super sacks of carbon. Includes cleaning compound Meta-Phos (corrosive, phosphoric acid) (pink arrow) near numerous drums of HWorganics.	NE	7310045	2:19 PM	7/31/2023
24	46	46	CHESI Transfer Area - Roll-off 10-day storage area with cracks and spalling in concrete.	S	7310046	2:24 PM	7/31/2023
---	Not in report	47	CHESI Transfer Area - Roll-off 10-day storage area with cracks and spalling in concrete.	SE	7310047	2:24 PM	7/31/2023
---	Not in report	48	CHESI Transfer Area - Roll-off 10-day storage area with cracks and spalling in concrete.	SE	7310048	2:25 PM	7/31/2023
25	49	49	CHESI Transfer Area - Tanker trailers 10-day storage area with cracks and spalling in concrete.	N	7310049	2:26 PM	7/31/2023
26	50	50	CHESI Transfer Area - Sampling bay with one 1-yd3 open box of spent PPE and 2 open boxes of non-HW general trash labeled "No Metals".	NE	8010050	8:46 AM	8/1/2023
---	Not in report	51	CHESI Transfer Area - Sampling Bay - One 1-yd3 open box about 1/3rd full of spent PPE labeled HW. Close up of HW label.	NE	8010051	8:46 AM	8/1/2023
27	52	52	CHESI Transfer Area - Sampling Bay - One 1-yd3 open box about 1/3rd full of spent PPE labeled HW. Looking inside the box.	NE	8010052	8:46 AM	8/1/2023
28	53	53	CHESI Transfer Area - Sampling Bay - One 1-yd3 open box about 1/3rd full of spent PPE labeled HW. One closed labeled 55-gallon drum of spent PPE/lab waste partially full.	SW	8010053	8:50 AM	8/1/2023
---	Not in report	54	CHESI Transfer Area - Sampling Bay - One 1-yd3 open box about 1/3rd full of spent PPE labeled HW. Close up of HW label. North side of HW PPE box in Photo 53.	SW	8010054	8:50 AM	8/1/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
29	55	55	CHESI Transfer Area - Sampling Bay - 2 open boxes of non-HW general trash labeled "No Metals".	NW	8010055	8:53 AM	8/1/2023
30	56	56	CHESI Transfer Area - Sampling Bay - One 1-yd3 open box about 1/3rd full of spent PPE labeled HW. Looking inside box on left in Photo 55.	NW	8010056	8:53 AM	8/1/2023
31	57	57	CHESI Transfer Area - Sampling Bay - One 1-yd3 open box about 1/3rd full of spent PPE labeled HW. Looking inside box on right in Photo 55.	NW	8010057	8:53 AM	8/1/2023
---	Not in report	58	CHESI Transfer Area - Tanker trailers 10-day storage area with cracks and spalling in concrete. Dust is non-hazardous from construction site.	SE	8010058	9:09 AM	8/1/2023
---	Not in report	59	CHESI Transfer Area - Tanker trailers 10-day storage area with cracks and spalling in concrete. Close-up of cracks in concrete seams.	S	8010059	9:09 AM	8/1/2023
---	Not in report	60	CHDP Waste Receiving Pad - Permitted roll-off storage area #106 (NOR #167). No signage posted regarding permit or NOR numbers.	SW	8010060	9:17 AM	8/1/2023
32	61	61	CHDP Waste Receiving Pad - Permitted roll-off storage area #106 (NOR #167). No signage posted regarding permit or NOR numbers.	SW	8010061	9:17 AM	8/1/2023
---	Not in report	62	CHDP Waste Receiving Pad - BIN #VB12007 randomly selected for tracking.	SW	8010062	9:18 AM	8/1/2023
---	Not in report	63	CHDP Waste Receiving Pad - BIN #VB12007 randomly selected for tracking. Close-up of CHDP sampling label.	W	8010063	9:18 AM	8/1/2023
---	Not in report	64	CHDP Waste Receiving Pad - BIN #VB12007 randomly selected for tracking. Close up of container tracking ticket.	S	8010064	9:18 AM	8/1/2023
---	Not in report	65	CHDP Waste Receiving Pad - BIN #VB12007 randomly selected for tracking. Close up of HW label.	W	8010065	9:19 AM	8/1/2023
33	66	66	CHDP Waste Receiving Pad - BIN #CHVB0684 was labeled PCBs and leaking, although it was believed to be empty based on the sound when tapping on its side.	NE	8010066	9:22 AM	8/1/2023
---	Not in report	67	CHDP Waste Receiving Pad - BIN #CHVB0684 was labeled PCBs and leaking, although it was believed to be empty based on the sound when tapping on its side.	NE	8010067	9:22 AM	8/1/2023
---	Not in report	68	CHDP Waste Receiving Pad - BIN #CHVB0684 was labeled PCBs and leaking, although it was believed to be empty based on the sound when tapping on its side.	SW	8010068	9:23 AM	8/1/2023
---	Not in report	69	CHDP Waste Receiving Pad - BIN #CHVB0684 was labeled PCBs and leaking, although it was believed to be empty based on the sound when tapping on its side.	SW	8010069	9:23 AM	8/1/2023
34	70	70	CHDP Waste Receiving Pad - BIN #CHVB0684 was labeled PCBs and leaking, although it was believed to be empty based on the sound when tapping on its side.	SE	8010070	9:24 AM	8/1/2023
---	Not in report	71	CHDP Waste Receiving Pad - BIN #RT-251988, manifest #024041343JJK, randomly selected for tracking.	SW	8010071	9:26 AM	8/1/2023
35	72	72	CHDP Waste Receiving Pad - Permitted roll-off storage area #106 (NOR #167). Secondary containment with cracks in drainage collection wall along with apparently weeds, algae, residue, little fish, and liquid.	S	8010072	9:28 AM	8/1/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
---	Not in report	73	CHDP Waste Receiving Pad - BIN #CHVB0230 that was dated 5/8/23 and labeled non-hazardous construction debris, however a stain was observed underneath it. Close up of label.	SW	8010073	9:31 AM	8/1/2023
---	Not in report	74	CHDP Waste Receiving Pad - BIN #CHVB0230 that was dated 5/8/23 and labeled non-hazardous construction debris, however a stain was observed underneath it. Close up of BIN container number.	SW	8010074	9:31 AM	8/1/2023
36	75	75	CHDP Waste Receiving Pad - BIN #CHVB0230 (yellow arrow) that was dated 5/8/23 and labeled non-hazardous construction debris, however a stain was observed underneath it. Cracks and spalling in area. Drainage collection wall with crack (blue arrow) and weeds growing inside and outside of the drainage collection area.	NW	8010075	9:32 AM	8/1/2023
37	76	76	CHDP Waste Receiving Pad - BIN #CHVB0230 that was dated 5/8/23 and labeled non-hazardous construction debris, however a stain was observed underneath it. Residue and weeds in containment. Close up of stain.	NW	8010076	9:32 AM	8/1/2023
38	77	77	CHDP Waste Receiving Pad - Drainage collection wall with crack and weeds growing outside of the drainage collection wall. Residue in containment area.	W	8010077	9:32 AM	8/1/2023
39	78	78	CHDP Waste Receiving Pad - Secondary containment with cracks in drainage collection wall along with apparently weeds, algae, residue, little fish, and liquid. Close up of crack in wall and fish.	NW	8010078	9:33 AM	8/1/2023
40	79	79	CHESI Tank Wash Area - Looking inside open unlabeled drum approximately half full of spent PPE/general trash shown in Photo 80.	SE	8010079	9:35 AM	8/1/2023
41	80	80	CHESI Tank Wash Area - Open unlabeled drum approximately half full of spent PPE/general trash.	SE	8010080	9:35 AM	8/1/2023
42	81	81	CHESI Tank Wash Area - Tanker in wash bay (east side) for cleaning. Wash pad (west side) with cracks that conveys the wastewater to the 4 HW tanks in background. Liquid puddles on pad.	SE	8010081	9:37 AM	8/1/2023
---	Not in report	82	CHESI Tank Wash Area - Close up of wash pad cracks on west side in Photo 81.	W	8010082	9:37 AM	8/1/2023
---	Not in report	83	CHESI Tank Wash Area - Close up of wash pad cracks on west side in Photo 81.	SW	8010083	9:37 AM	8/1/2023
---	Not in report	84	CHESI Tank Wash Area - Close up of wash pad cracks on west side in Photo 81.	S	8010084	9:37 AM	8/1/2023
43	85	85	CHESI Tank Wash Area - Wash pad sump close up with sheen in liquid around top and sump full up to about 6 in from the top.	S	8010085	9:38 AM	8/1/2023
---	Not in report	86	CHESI Tank Wash Area - Close up of poor condition drum in the 4 HW tank containment liner that was determined to be empty. Residue in the containment.	SW	8010086	9:40 AM	8/1/2023
44	87	87	CHESI Tank Wash Area - Close up of label on drum of heels flush (D001 - Dichloroethane, dated 8/1/23) generated from the tanker in wash bay for cleaning.	NE	8010087	9:41 AM	8/1/2023
---	Not in report	88	CHESI Tank Wash Area - Wash pad (east side) with cracks that conveys the wastewater to the 4 HW tanks. Liquid puddles on pad.	N	8010088	9:42 AM	8/1/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
45	89	89	CHESI Tank Wash Area - Wash pad (east side) where tanker was located for cleaning. Liquid puddles on pad. Two blue drum of heels flush (D001 - Dichloroethane, dated 8/1/23) generated from the tanker in wash bay for cleaning. Black drums in corner were empty and one open drum of general trash.	S	8010089	9:42 AM	8/1/2023
---	Not in report	90	CHESI Tank Wash Area - Wash pad (east side) where tanker was located for cleaning.	SW	8010090	9:43 AM	8/1/2023
46	91	91	CHESI Tank Wash Area - CSA - 6 drums with white CHDP labels awaiting to be sent to CHDP. South security fence in background of which some drums labeled as ignitable (D001) being stored within 50 ft.	SW	8010091	9:46 AM	8/1/2023
---	Not in report	92	CHESI Tank Wash Area - CSA - Cracks and spalling in the area. Part of the numerous 55-gallon drums full to partially full of heel flushes labeled as HW to be sent to CHDP. The black drums were empty.	SE	8010092	9:49 AM	8/1/2023
---	Not in report	93	CHESI Tank Wash Area - CSA - Close up of the product labels on empty drums in Photo 92.	SE	8010093	9:49 AM	8/1/2023
---	Not in report	94	CHESI Tank Wash Area - CSA - Cracks and spalling near the middle of the CSA.	NE	8010094	9:51 AM	8/1/2023
---	Not in report	95	CHESI Tank Wash Area - CSA - Cracks and spalling near the middle of the CSA. Close up of Photo 94.	NE	8010095	9:51 AM	8/1/2023
---	Not in report	96	CHESI Tank Wash Area - Residue and liquid puddles inside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed. Weeds growing in seams of concrete pad the liner sits on. Water tank outside of containment liner shown in photo.	NW	8010096	9:53 AM	8/1/2023
47	97	97	CHESI Tank Wash Area - HW tank #4 with hatch open.	NW	8010097	9:53 AM	8/1/2023
48	98	98	CHESI Tank Wash Area - HW tank #3 with hatch open.	NE	8010098	9:53 AM	8/1/2023
49	99	99	CHESI Tank Wash Area - HW tanks #1 and #2 with hatches open. Ladder on tank #1 used to climb on top of tanks to check levels. Cracks and spalling shown in concrete the containment liner sits on.	NE	8010099	9:53 AM	8/1/2023
50	100	100	CHESI Tank Wash Area - Apparent direction of stormwater flow near the 4 HW tank secondary containment liner. Weeds growing in seams of concrete pad the liner sits on. CSA shown in background where ignitables and reactives are stored within 50 ft of the property line security fence. Totes in background do not contain waste.	E	8010100	9:54 AM	8/1/2023
---	Not in report	101	CHESI Tank Wash Area - Property line security fence on southside of the facility near the 4 HW tanks.	SW	8010101	9:55 AM	8/1/2023
	Not in report	102	CHESI Tank Wash Area - Property line security fence on southside of the facility near the CSA. Ignitables and reactives are stored within 50 ft of the property line security fence. Totes do not contain waste.	E	8010102	10:01 AM	8/1/2023
51	103	103	CHESI Tank Wash Area - Looking inside the Waste Management approximately 3-cubic yard dumpster about half full of spent PPE/general trash that was open, unlabeled, and undated shown in photo 141.	SW	8010103	10:07 AM	8/1/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
---	Not in report	104	CHESI Tank Wash Area - Container of residue later determined to be dirt with piles of dirt on the side of it.	SW	8010104	10:07 AM	8/1/2023
52	105	105	CHESI Tank Wash Area - Looking inside container of residue later determined to be dirt in Photos 104 and 105.	SW	8010105	10:08 AM	8/1/2023
53	106	106	CHESI Tank Wash Area - Container of residue later determined to be dirt with piles of dirt on the side of it.	SW	8010106	10:09 AM	8/1/2023
---	Not in report	107	CHESI Transfer Area - South property line security fence along the roll-off 10-day storage area.	E	8010107	10:40 AM	8/1/2023
54	108	108	CHESI Transfer Area - South property line security fence along the roll-off 10-day storage area and tank wash area. The sign posted was believed to be a Danger warning sign but we could not see to verify.	W	8010108	10:40 AM	8/1/2023
---	Not in report	109	CHESI Transfer Area - Roll-off 10-day storage area with cracks and spalling in concrete.	N	8010109	10:40 AM	8/1/2023
---	Not in report	110	CHESI Transfer Area - Roll-off 10-day storage area with cracks and spalling in concrete.	S	8010110	10:41 AM	8/1/2023
---	Not in report	111	CHESI Transfer Area - Roll-off 10-day storage area with cracks and spalling in concrete.	NE	8010111	10:41 AM	8/1/2023
55	112	112	CHESI Transfer Area - East property line security fence along the roll-off 10-day storage area and cracks and spalling in concrete.	N	8010112	10:42 AM	8/1/2023
---	Not in report	113	CHESI Transfer Area - Close up of cracks in the Trailer/Tanker 10-day storage area .	NE	8010113	10:43 AM	8/1/2023
56	114	114	CHESI Transfer Area - East property line security fence along the roll-off 10-day storage area and cracks and spalling in concrete.	S	8010114	10:43 AM	8/1/2023
57	115	115	CHESI Transfer Area - New tank wash facility being built on the right side of the building. The sampling bays shown on the left side of the building.	NE	8010115	10:43 AM	8/1/2023
58	116	116	CHESI Transfer Area - East property line security fence near far east gate with Danger signs on open gate.	SE	8010116	10:45 AM	8/1/2023
59	117	117	CHESI Transfer Area - North security fence with Danger signs posted and middle gate on right side of photo.	SW	8010117	10:45 AM	8/1/2023
60	118	118	CHESI Transfer Area - Close up of the Danger signs posted on the north security fence shown in photo 117.	SW	8010118	10:45 AM	8/1/2023
---	Not in report	119	CHESI Transfer Area - Standing at open middle gate on north security fence where truck scale and trucks are staged for check in and inspections.	S	8010119	10:46 AM	8/1/2023
61	120	120	CHESI Transfer Area - Tanker and trailer 10-day storage area with cracks and spalling in concrete.	SE	8010120	10:51 AM	8/1/2023
---	Not in report	121	CHESI Transfer Area - Tanker and trailer 10-day storage area with cracks and spalling in concrete.	SE	8010121	10:51 AM	8/1/2023
62	122	122	CHDP Waste Receiving Pad - BIN with HW label stating manifest #018168736FLE and stain under the west end of container. Residue in containment area.	SE	8010122	10:52 AM	8/1/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
---	Not in report	123	CHDP Waste Receiving Pad - Close up of HW label on BIN with manifest #018168736FLE.	SE	8010123	10:52 AM	8/1/2023
63	124	124	CHDP Waste Receiving Pad - BIN with HW label stating manifest #018168736FLE and stain under the west end of container.	SW	8010124	10:53 AM	8/1/2023
64	125	125	CHESI Transfer Area - West security fence along the permitted storage pad. Residue in containment area.	S	8010125	10:54 AM	8/1/2023
---	Not in report	126	CHESI Transfer Area - West security fence along the permitted storage pad. Residue in containment area.	N	8010126	10:55 AM	8/1/2023
---	Not in report	127	CHESI Transfer Area - West security fence with small opening.	W	8010127	10:55 AM	8/1/2023
---	Not in report	128	CHESI Transfer Area - Where the west security fence was removed near the Transportation Group modular building on left side of photo (blue arrow). Fence near minivan was for a small parking lot near the scale.	NW	8010128	10:57 AM	8/1/2023
65	129	129	CHESI Transfer Area - Where the west security fence was removed. Far west opening with no gate in background.	N	8010129	10:58 AM	8/1/2023
---	Not in report	130	CHESI Transfer Area - North fence line and where the west security fence was removed.	NE	8010130	10:58 AM	8/1/2023
---	Not in report	131	CHESI Transfer Area - Close up of where the west security fence was removed.	N	8010131	10:58 AM	8/1/2023
66	132	132	CHESI Transfer Area - Sampling bay after the 1-yd3 open box of spent PPE and 2 open boxes of non-HW general trash labeled "No Metals" were removed.	SE	8010132	12:14 PM	8/1/2023
67	133	133	CHDP Waste Receiving Pad - BINs being removed to change out poor condition roll-offs.	SW	8010133	12:17 PM	8/1/2023
68	134	134	CHESI Tank Wash Area - CSA after some drums of heel flushes had been removed and taken to CHDP. South security fence in background of which some drums labeled as ignitable (D001) and reactive (D003) are being stored within 50 ft.	SE	8010134	12:25 PM	8/1/2023
69	135	135	CHDP Waste Receiving Pad - BIN #CHVB0684 that was labeled PCB and leaking after a catch container was placed underneath the leak to catch the waste.	NE	8010135	12:29 PM	8/1/2023
70	136	136	CHESI Transfer Area - North fence line and part of the middle open gate. Where new tank wash facility is being built on right side of building.	S	1010136	9:08 AM	8/2/2023
---	Not in report	137	CHESI Transfer Area - North fence line.	SE	1010137	9:09 AM	8/2/2023
---	Not in report	138	CHESI Transfer Area - Sign posted (not a Danger sign) across from north fence near middle gate.	W	1010138	9:24 AM	8/2/2023
71	139	139	CHESI Transfer Area - Sign posted (not a Danger sign) near the far west opening with no gate.	SW	1010139	9:25 AM	8/2/2023
72	140	140	CHDP Waste Receiving Pad - Secondary containment drainage collection in the process of being cleaned.	S	1010140	9:26 AM	8/2/2023

Sum of Photos in Report	Photo # Referenced in Report	Photo #	Description / Direction Facing	Direction (see attached maps)	File Name PXXXXXXX.JPG	Time	Date
73	141	141	CHESI Tank Wash Area - Waste Management approximately 3-cubic yard dumpster about half full of spent PPE/general trash that was open, unlabeled, and undated and screened hopper shown in photo 106.	SW	1010141	10:32 AM	8/2/2023
74	142	142	CHESI Tank Wash Area - Container of residue later determined to be dirt with piles of dirt on the side of it after emptying.	S	1010142	10:32 AM	8/2/2023
---	Not in report	143	CHESI Tank Wash Area - CSA after some of the drums of heel flushes had been removed and taken to CHDP.	S	1010143	10:33 AM	8/2/2023
75	144	144	CHESI Tank Wash Area - CSA after some of the drums of heel flushes had been removed and taken to CHDP.	SW	1010144	10:37 AM	8/2/2023
76	145	145	CHESI Tank Wash Area - CSA after some of the drums of heel flushes had been removed and taken to CHDP. Black liner was originally put in place as secondary containment for the drums when they first started. Spill kit in yellow drum inside the 4 HW tank containment liner. Cracks and spalling throughout storage area.	SW	1010145	10:39 AM	8/2/2023
77	146	146	CHESI Tank Wash Area - The 4 HW tank secondary containment liner after started cleaning.	W	1010146	10:39 AM	8/2/2023
---	Not in report	147	CHESI Tank Wash Area - The 4 HW tank secondary containment liner after started cleaning. Some liquid waiting to be removed.	N	1010147	10:40 AM	8/2/2023
---	Not in report	148	CHESI Tank Wash Area - The 4 HW tank secondary containment liner after started cleaning. Some liquid waiting to be removed.	NW	1010148	10:40 AM	8/2/2023
78	149	149	CHESI Tank Wash Area - The 4 HW tank secondary containment liner after started cleaning. Liquid flowing outside of containment area toward the drums in the CSA was determined to be water flowing from a water line.	E	1010149	10:41 AM	8/2/2023
---	Not in report	150	CHESI Tank Wash Area - The 4 HW tank secondary containment liner after started cleaning. Close-up of photo 149.	E	1010150	10:41 AM	8/2/2023
79	151	151	CHESI Tank Wash Area - CSA after some of the drums of heel flushes had been removed and taken to CHDP. Black liner was originally put in place as secondary containment for the drums when they first started. Cracks and spalling throughout storage area.	S	1010151	10:42 AM	8/2/2023



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 1

Photo File Name: 7310001

Date of Photo: 7/31/2023

Time of Photo: 1:50 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Wash pad on concrete pad with berm and 4 HW tanks with no HW labels in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 2

Photo File Name: 7310002

Date of Photo: 7/31/2023

Time of Photo: 1:53 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Wash pad with 4 HW tanks in background with cloudy level sight glass tubes (pink arrow). Labeled Waste Water and not HW. Liquid on pad from wash down. Sump located on right side of photo (blue arrow).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 3

Photo File Name: 7310003

Date of Photo: 7/31/2023

Time of Photo: 2:03 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Wash pad sump close up. Liquid on pad from wash down. Residue and glove observed outside of west containment berm. Open, unlabeled plastic drum approximately full of spent PPE/general trash (yellow arrow), poor condition drum empty (green arrow), and black drum empty.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 6

Photo File Name: 7310006

Date of Photo: 7/31/2023

Time of Photo: 2:03 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Close-up of residue and liquid puddles inside and outside of the 4 HW tank secondary containment liner. Also, footprints in the residue outside the liner. Part of the liner wall was collapsed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 9

Photo File Name: 7310009

Date of Photo: 7/31/2023

Time of Photo: 2:04 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Close-up of inside PPE/general trash open unlabeled drum shown in Photo 3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 11

Photo File Name: 7310011

Date of Photo: 7/31/2023

Time of Photo: 2:05 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Residue inside the 4 HW tank secondary containment liner and in between the liner wall and the wash pad's berm. Hoses with duct tape used to convey HW into the HW tanks (blue arrows).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 12

Photo File Name: 7310012

Date of Photo: 7/31/2023

Time of Photo: 2:06 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Close-up of HW tanks diaphragm pump and hoses with duct tape (blue arrows).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 13

Photo File Name: 7310013

Date of Photo: 7/31/2023

Time of Photo: 2:06 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Close-up of HW tanks diaphragm pump hose with duct tape.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 14

Photo File Name: 7310014

Date of Photo: 7/31/2023

Time of Photo: 2:07 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Residue and liquid puddles inside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed. L-shaped angle braces located near liner wall where collapsed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 16

Photo File Name: 7310016

Date of Photo: 7/31/2023

Time of Photo: 2:07 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Close up of residue and liquid puddles inside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed. Some of the liquid observed on top of the liner wall that collapsed. L-shaped angle braces located near liner wall where collapsed. Weeds growing in and around seams of concrete pad the liner sits on.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 17

Photo File Name: 7310017

Date of Photo: 7/31/2023

Time of Photo: 2:07 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Close up of residue and liquid puddles inside of the 4 HW tank secondary containment liner. Part of the liner wall was collapsed. Weeds growing in seams of concrete pad the liner sits on.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 18

Photo File Name: 7310018

Date of Photo: 7/31/2023

Time of Photo: 2:09 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Numerous 55-gallon drums full to partially full of heel flushes labeled as HW to be sent to CHDP. Label was the yellow/white label with a partial date of month and day except for one label that had no date. No white CHDP labels except for 6 drums. South security fence in background of which some drums labeled as ignitable (D001) and reactive (D003) are being stored within 50 ft.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 22

Photo File Name: 7310022

Date of Photo: 7/31/2023

Time of Photo: 2:12 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Numerous 55-gallon drums full to partially full of heel flushes labeled as HW to be sent to CHDP. Label was the yellow/white label with a partial date of month and day except for one label that had no date. No white CHDP labels except for 6 drums. South security fence in background of which some drums labeled as ignitable (D001) and reactive (D003) are being stored within 50 ft.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 23

Photo File Name: 7310023

Date of Photo: 7/31/2023

Time of Photo: 2:12 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Part of the numerous 55-gallon drums full to partially full of heel flushes labeled as HW to be sent to CHDP, except approximately 14 drums with no labels at the end of the row.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 25

Photo File Name: 7310025

Date of Photo: 7/31/2023

Time of Photo: 2:13 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Close up of a D001/D003 HW label dated 7/7 on a drum shown in Photo 18.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 30

Photo File Name: 7310030

Date of Photo: 7/31/2023

Time of Photo: 2:15 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Close up of a D003 HW label dated 6/21 on a drum shown in Photo 18.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas

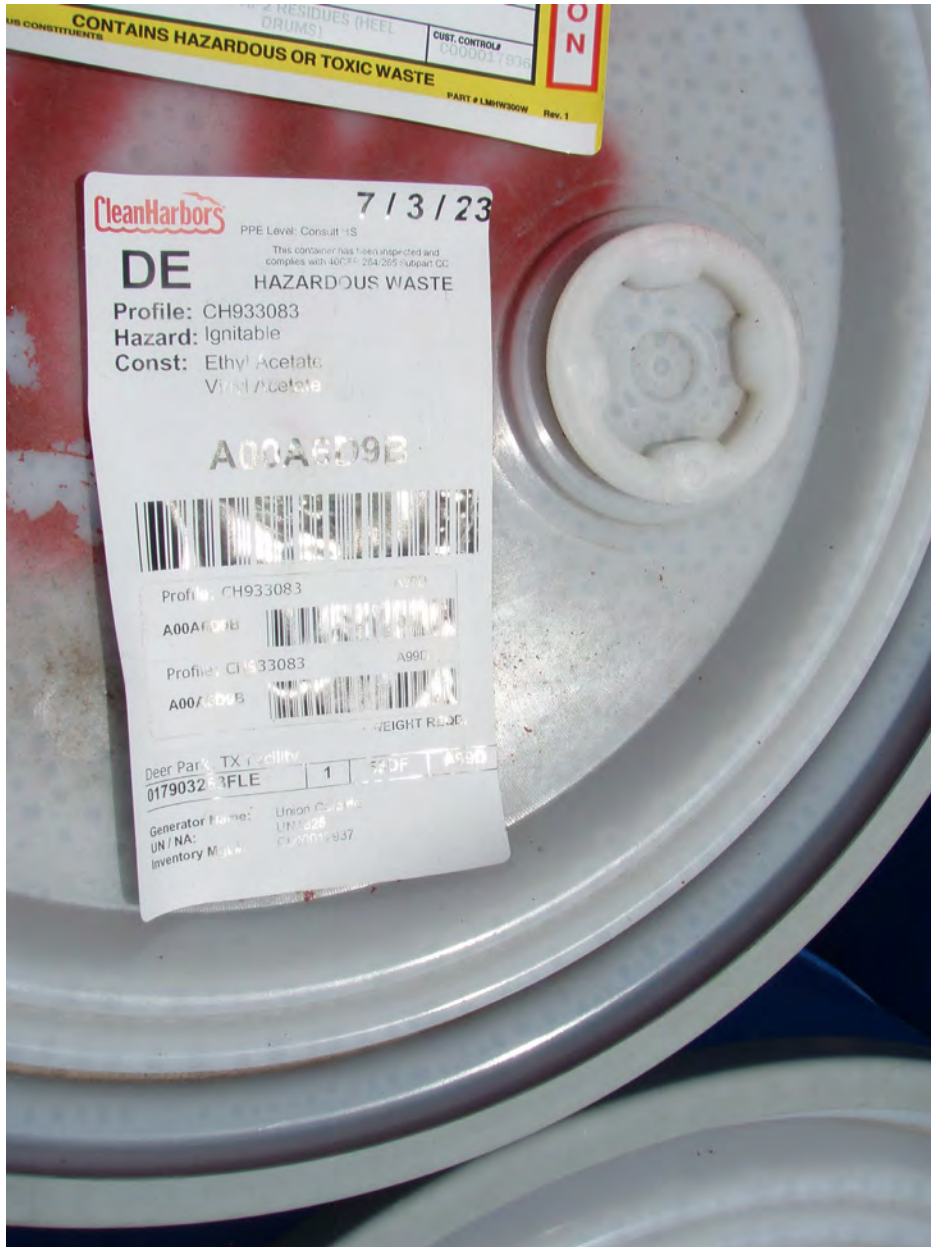


PHOTO No. 32

Photo File Name: 7310032

Date of Photo: 7/31/2023

Time of Photo: 2:15 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Close up of a ignitable CHDP label dated 7/3/23 on a drum shown in Photo 18.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas

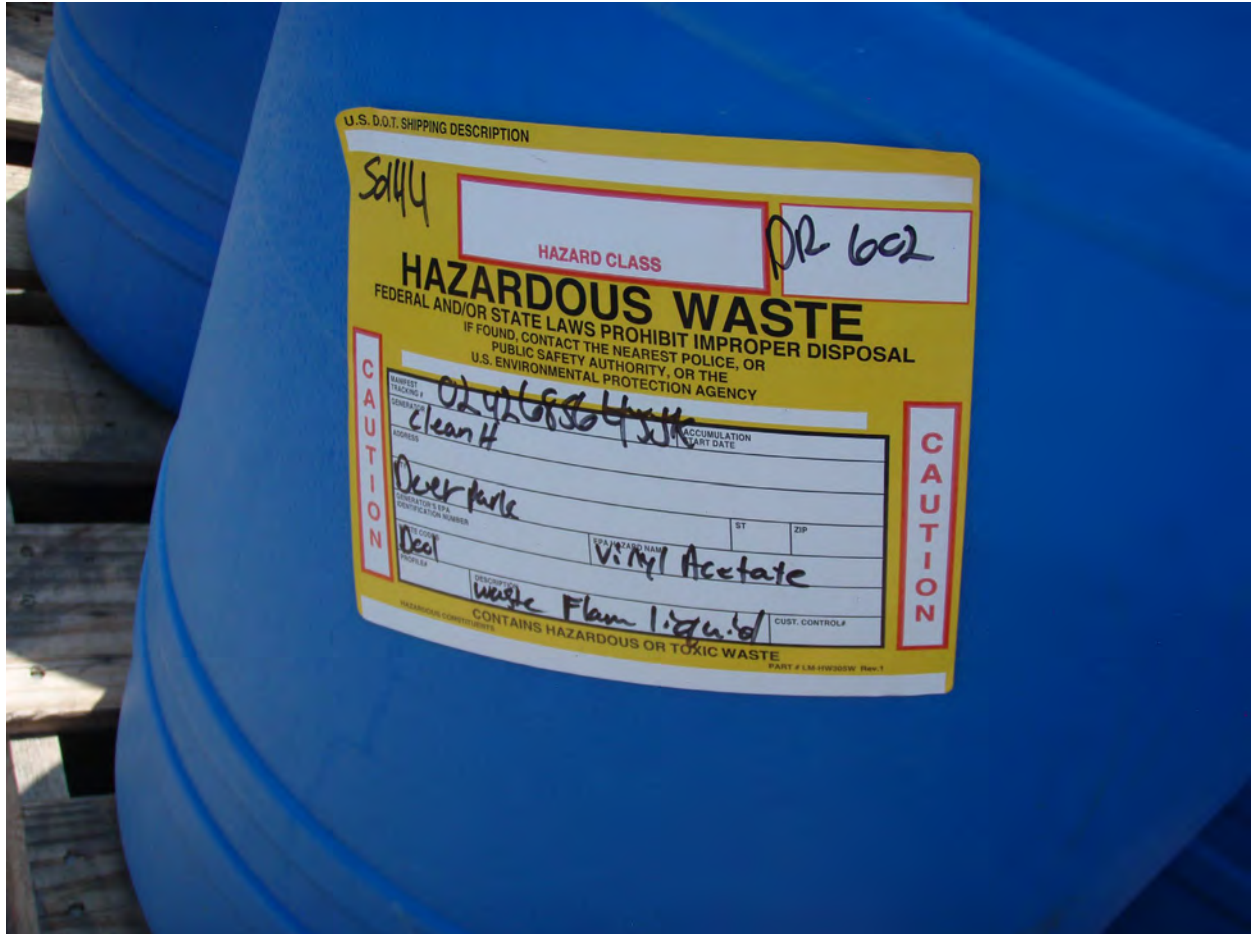


PHOTO No. 33

Photo File Name: 7310033

Date of Photo: 7/31/2023

Time of Photo: 2:15 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Close up of a D001 HW label not dated on a drum shown in Photo 18.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas

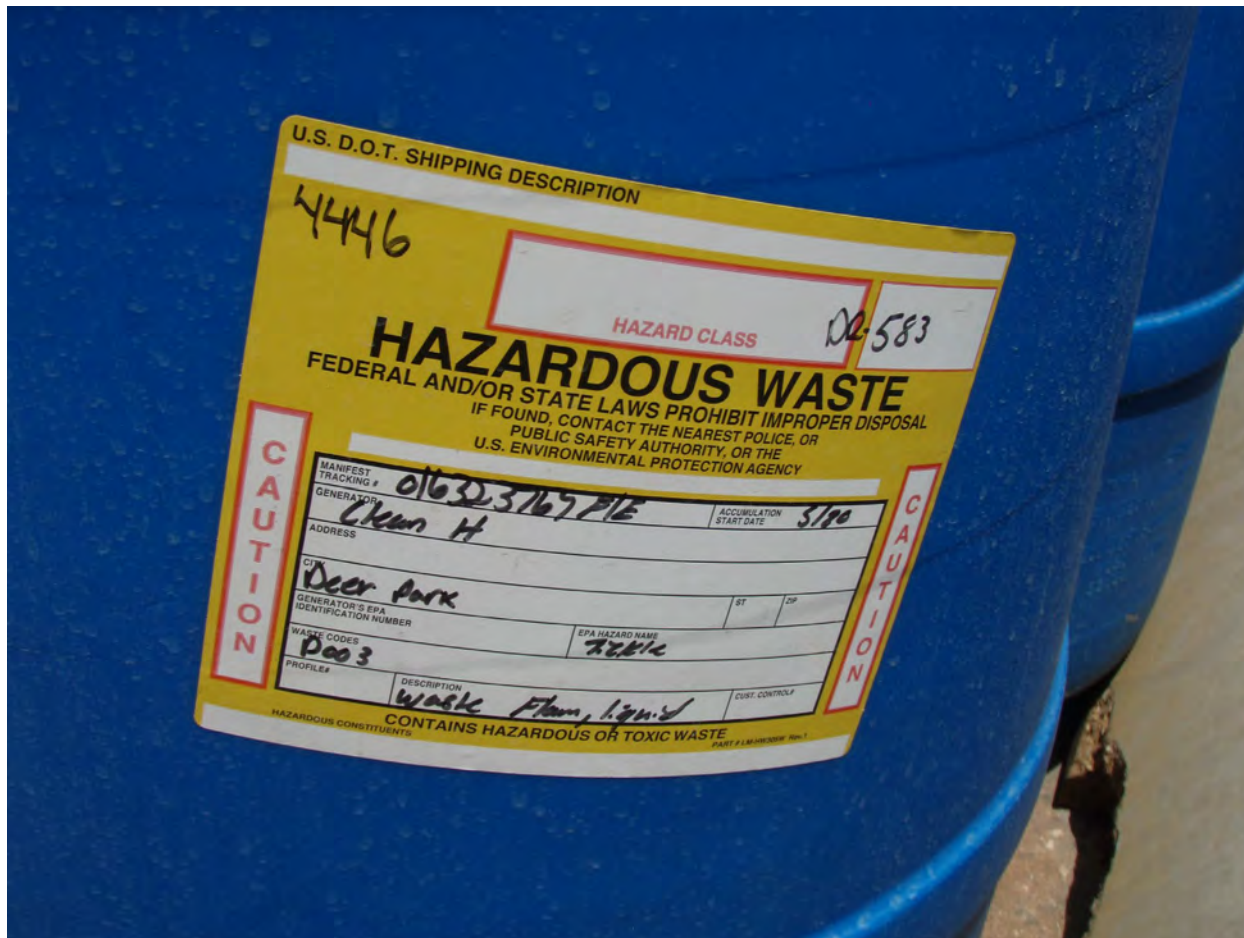


PHOTO No. 36

Photo File Name: 7310036

Date of Photo: 7/31/2023

Time of Photo: 2:16 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Close up of a D003 HW label dated 5/20 on a drum shown in Photo 18.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 38

Photo File Name: 7310038

Date of Photo: 7/31/2023

Time of Photo: 2:17 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - 4 HW tanks and water tank. Weeds growing in and around concrete seams that the HW tank secondary containment liner sits on. Liquid stains on concrete next to liner.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 42

Photo File Name: 7310042

Date of Photo: 7/31/2023

Time of Photo: 2:18 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Close up of cracks and spalling along concrete seams in area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 44

Photo File Name: 7310044

Date of Photo: 7/31/2023

Time of Photo: 2:18 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - Close up of cleaning compound, Meta-Phos (corrosive, phosphoric acid), shown in Photos 37 and 45.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 45

Photo File Name: 7310045

Date of Photo: 7/31/2023

Time of Photo: 2:19 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - East side of wash pad next to CSA where products are stored in white drums and super sacks of carbon. Includes cleaning compound Meta-Phos (corrosive, phosphoric acid) (pink arrow) near numerous drums of HW organics.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 46

Photo File Name: 7310046

Date of Photo: 7/31/2023

Time of Photo: 2:24 PM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Roll-off 10-day storage area with cracks and spalling in concrete.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 49

Photo File Name: 7310049

Date of Photo: 7/31/2023

Time of Photo: 2:26 PM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Tanker trailers 10-day storage area with cracks and spalling in concrete.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 50

Photo File Name: 8010050

Date of Photo: 8/1/2023

Time of Photo: 8:46 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Sampling bay with one 1-yd3 open box of spent PPE and 2 open boxes of non-HW general trash labeled "No Metals".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 52

Photo File Name: 8010052

Date of Photo: 8/1/2023

Time of Photo: 8:46 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Sampling Bay - One 1-yd³ open box about 1/3rd full of spent PPE labeled HW. Looking inside the box.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 53

Photo File Name: 8010053

Date of Photo: 8/1/2023

Time of Photo: 8:50 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Sampling Bay - One 1-yd³ open box about 1/3rd full of spent PPE labeled HW. One closed labeled 55-gallon drum of spent PPE/lab waste partially full.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 55

Photo File Name: 8010055

Date of Photo: 8/1/2023

Time of Photo: 8:53 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Sampling Bay - 2 open boxes of non-HW general trash labeled "No Metals".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 56

Photo File Name: 8010056

Date of Photo: 8/1/2023

Time of Photo: 8:53 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Sampling Bay - One 1-yd³ open box about 1/3rd full of spent PPE labeled HW. Looking inside box on left in Photo 55.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 57

Photo File Name: 8010057

Date of Photo: 8/1/2023

Time of Photo: 8:53 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Sampling Bay - One 1-yd³ open box about 1/3rd full of spent PPE labeled HW. Looking inside box on right in Photo 55.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 61

Photo File Name: 8010061

Date of Photo: 8/1/2023

Time of Photo: 9:17 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - Permitted roll-off storage area #106 (NOR #167). No signage posted regarding permit or NOR numbers.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 66

Photo File Name: 8010066

Date of Photo: 8/1/2023

Time of Photo: 9:22 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - BIN #CHVB0684 was labeled PCBs and leaking, although it was believed to be empty based on the sound when tapping on its side.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 70

Photo File Name: 8010070

Date of Photo: 8/1/2023

Time of Photo: 9:24 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - BIN #CHVB0684 was labeled PCBs and leaking, although it was believed to be empty based on the sound when tapping on its side.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 70

Photo File Name: 8010072

Date of Photo: 8/1/2023

Time of Photo: 9:28 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - Permitted roll-off storage area #106 (NOR #167). Secondary containment with cracks in drainage collection wall along with apparently weeds, algae, residue, little fish, and liquid.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 75

Photo File Name: 8010075

Date of Photo: 8/1/2023

Time of Photo: 9:32 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - BIN #CHVB0230 (yellow arrow) that was dated 5/8/23 and labeled non-hazardous construction debris, however a stain was observed underneath it. Cracks and spalling in area. Drainage collection wall with crack (blue arrow) and weeds growing inside and outside of the drainage collection area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 76

Photo File Name: 8010076

Date of Photo: 8/1/2023

Time of Photo: 9:32 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - BIN #CHVB0230 that was dated 5/8/23 and labeled non-hazardous construction debris, however a stain was observed underneath it. Residue and weeds in containment. Close up of stain.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 77

Photo File Name: 8010077

Date of Photo: 8/1/2023

Time of Photo: 9:32 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - Drainage collection wall with crack and weeds growing outside of the drainage collection wall. Residue in containment area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 78

Photo File Name: 8010078

Date of Photo: 8/1/2023

Time of Photo: 9:33 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - Secondary containment with cracks in drainage collection wall along with apparently weeds, algae, residue, little fish, and liquid. Close up of crack in wall and fish.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 79

Photo File Name: 8010079

Date of Photo: 8/1/2023

Time of Photo: 9:35 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Looking inside open unlabeled drum approximately half full of spent PPE/general trash shown in Photo 80.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 80

Photo File Name: 8010080

Date of Photo: 8/1/2023

Time of Photo: 9:35 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Open unlabeled drum approximately half full of spent PPE/general trash.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 81

Photo File Name: 8010081

Date of Photo: 8/1/2023

Time of Photo: 9:37 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Tanker in wash bay (east side) for cleaning. Wash pad (west side) with cracks that conveys the wastewater to the 4 HW tanks in background. Liquid puddles on pad.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 85

Photo File Name: 8010085

Date of Photo: 8/1/2023

Time of Photo: 9:38 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Wash pad sump close up with sheen in liquid around top and sump full up to about 6 in from the top.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas

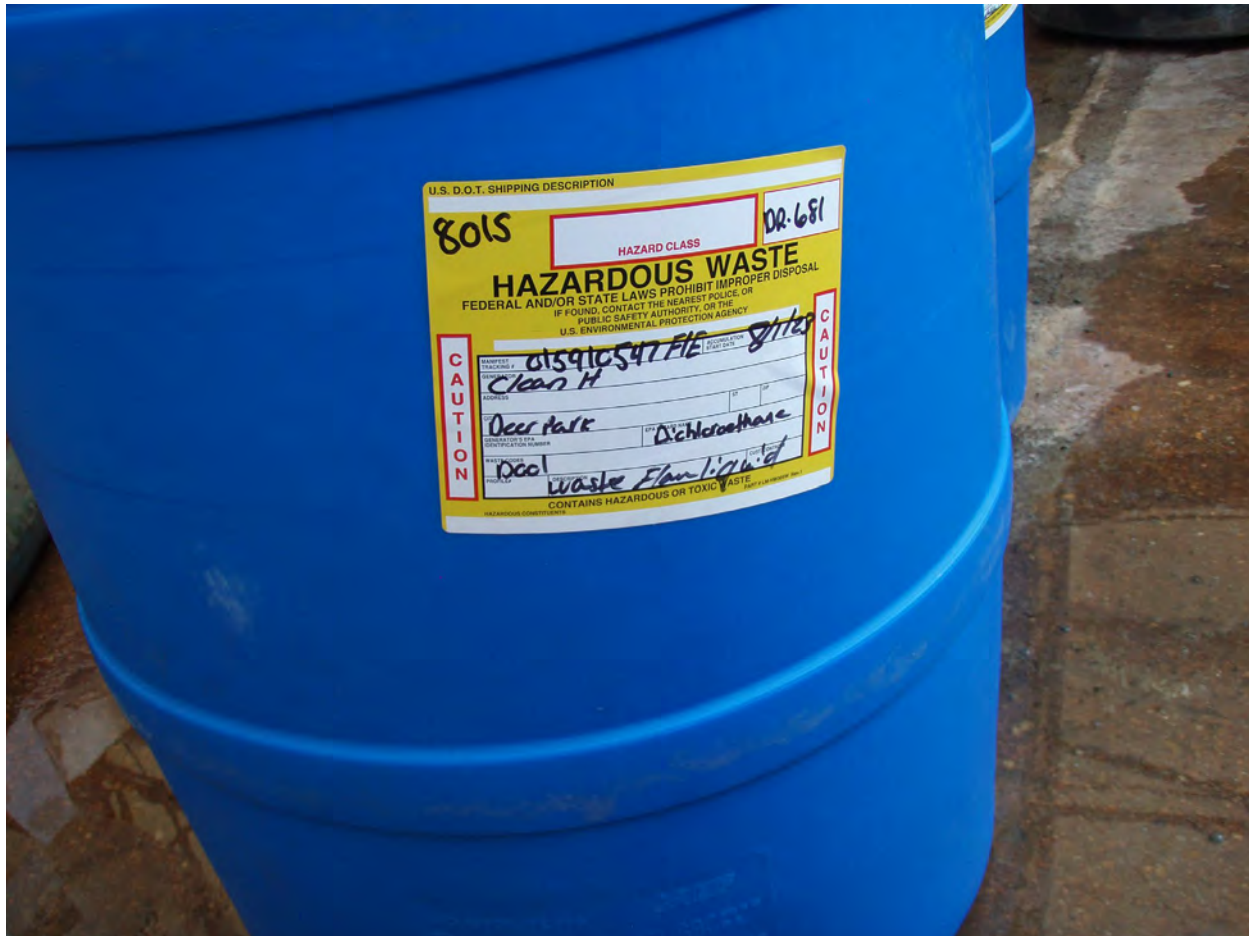


PHOTO No. 87

Photo File Name: 8010087

Date of Photo: 8/1/2023

Time of Photo: 9:41 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Close up of label on drum of heels flush (D001 - Dichloroethane, dated 8/1/23) generated from the tanker in wash bay for cleaning.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 89

Photo File Name: 8010089

Date of Photo: 8/1/2023

Time of Photo: 9:42 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Wash pad (east side) where tanker was located for cleaning. Liquid puddles on pad. Two blue drum of heels flush (D001 - Dichloroethane, dated 8/1/23) generated from the tanker in wash bay for cleaning. Black drums in corner were empty and one open drum of general trash.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 91

Photo File Name: 8010091

Date of Photo: 8/1/2023

Time of Photo: 9:46 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA - 6 drums with white CHDP labels awaiting to be sent to CHDP. South security fence in background of which some drums labeled as ignitable (D001) being stored within 50 ft.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 97

Photo File Name: 8010097

Date of Photo: 8/1/2023

Time of Photo: 9:53 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - HW tank #4 with hatch open.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 98

Photo File Name: 8010098

Date of Photo: 8/1/2023

Time of Photo: 9:53 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - HW tank #3 with hatch open.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 99

Photo File Name: 8010099

Date of Photo: 8/1/2023

Time of Photo: 9:53 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - HW tanks #1 and #2 with hatches open. Ladder on tank #1 used to climb on top of tanks to check levels. Cracks and spalling shown in concrete the containment liner sits on.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 100

Photo File Name: 8010100

Date of Photo: 8/1/2023

Time of Photo: 9:54 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Apparent direction of stormwater flow near the 4 HW tank secondary containment liner. Weeds growing in seams of concrete pad the liner sits on. CSA shown in background where ignitables and reactives are stored within 50 ft of the property line security fence. Totes in background do not contain waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 103

Photo File Name: 8010103

Date of Photo: 8/1/2023

Time of Photo: 10:07 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Looking inside the Waste Management approximately 3-cubic yard dumpster about half full of spent PPE/general trash that was open, unlabeled, and undated shown in photo 141.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 105

Photo File Name: 8010105

Date of Photo: 8/1/2023

Time of Photo: 10:08 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Looking inside container of residue later determined to be dirt in Photos 104 and 105.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 106

Photo File Name: 8010106

Date of Photo: 8/1/2023

Time of Photo: 10:09 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Container of residue later determined to be dirt with piles of dirt on the side of it.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas

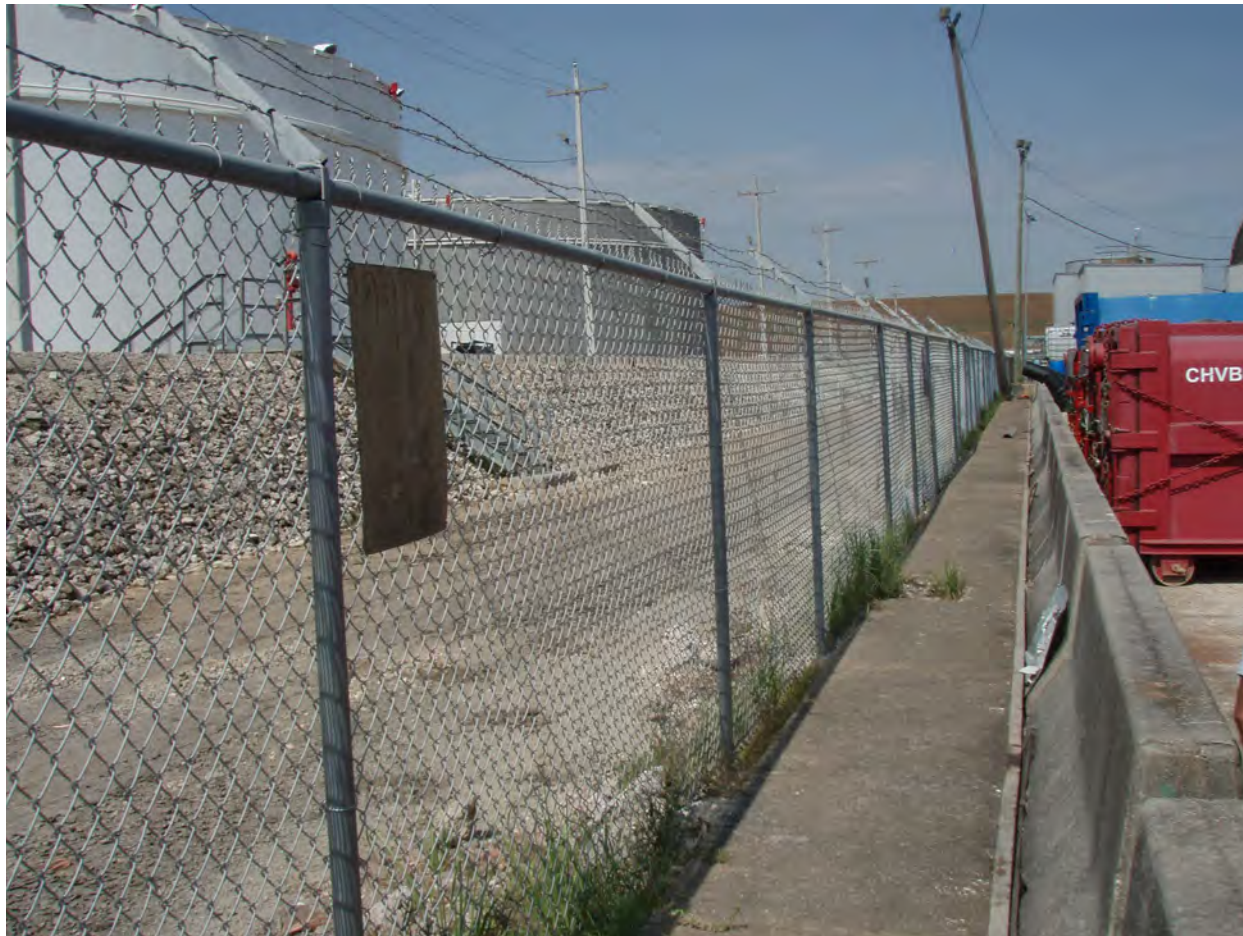


PHOTO No. 108

Photo File Name: 8010108

Date of Photo: 8/1/2023

Time of Photo: 10:40 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - South property line security fence along the roll-off 10-day storage area and tank wash area. The sign posted was believed to be a Danger warning sign but we could not see to verify.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 112

Photo File Name: 8010112

Date of Photo: 8/1/2023

Time of Photo: 10:42 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - East property line security fence along the roll-off 10-day storage area and cracks and spalling in concrete.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 114

Photo File Name: 8010114

Date of Photo: 8/1/2023

Time of Photo: 10:43 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - East property line security fence along the roll-off 10-day storage area and cracks and spalling in concrete.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 115

Photo File Name: 8010115

Date of Photo: 8/1/2023

Time of Photo: 10:43 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - New tank wash facility being built on the right side of the building.
The sampling bays shown on the left side of the building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 116

Photo File Name: 8010116

Date of Photo: 8/1/2023

Time of Photo: 10:45 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - East property line security fence near far east gate with Danger signs on open gate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 117

Photo File Name: 8010117

Date of Photo: 8/1/2023

Time of Photo: 10:45 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - North security fence with Danger signs posted and middle gate on right side of photo.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 118

Photo File Name: 8010118

Date of Photo: 8/1/2023

Time of Photo: 10:45 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Close up of the Danger signs posted on the north security fence shown in photo 117.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 120

Photo File Name: 8010120

Date of Photo: 8/1/2023

Time of Photo: 10:51 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Tanker and trailer 10-day storage area with cracks and spalling in concrete.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 122

Photo File Name: 8010122

Date of Photo: 8/1/2023

Time of Photo: 10:52 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - BIN with HW label stating manifest #018168736FLE and stain under the west end of container. Residue in containment area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 124

Photo File Name: 8010124

Date of Photo: 8/1/2023

Time of Photo: 10:53 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - BIN with HW label stating manifest #018168736FLE and stain under the west end of container.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 125

Photo File Name: 8010125

Date of Photo: 8/1/2023

Time of Photo: 10:54 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - West security fence along the permitted storage pad. Residue in containment area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 129

Photo File Name: 8010129

Date of Photo: 8/1/2023

Time of Photo: 10:58 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Where the west security fence was removed. Far west opening with no gate in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 132

Photo File Name: 8010132

Date of Photo: 8/1/2023

Time of Photo: 12:14 PM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Sampling bay after the 1-yd3 open box of spent PPE and 2 open boxes of non-HW general trash labeled "No Metals" were removed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 133

Photo File Name: 8010133

Date of Photo: 8/1/2023

Time of Photo: 12:17 PM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - BINs being removed to change out poor condition roll-offs.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 134

Photo File Name: 8010134

Date of Photo: 8/1/2023

Time of Photo: 12:25 PM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA after some drums of heel flushes had been removed and taken to CHDP. South security fence in background of which some drums labeled as ignitable (D001) and reactive (D003) are being stored within 50 ft.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 135

Photo File Name: 8010135

Date of Photo: 8/1/2023

Time of Photo: 12:29 PM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - BIN #CHVB0684 that was labeled PCB and leaking after a catch container was placed underneath the leak to catch the waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 136

Photo File Name: 1010136

Date of Photo: 8/2/2023

Time of Photo: 9:08 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - North fence line and part of the middle open gate. Where new tank wash facility is being built on right side of building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 139

Photo File Name: 1010139

Date of Photo: 8/2/2023

Time of Photo: 9:25 AM

Photographer: Dedriel Gardner

Description: CHESI Transfer Area - Sign posted (not a Danger sign) near the far west opening with no gate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 140

Photo File Name: 1010140

Date of Photo: 8/2/2023

Time of Photo: 9:26 AM

Photographer: Dedriel Gardner

Description: CHDP Waste Receiving Pad - Secondary containment drainage collection in the process of being cleaned.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 141

Photo File Name: 1010141

Date of Photo: 8/2/2023

Time of Photo: 10:32 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Waste Management approximately 3-cubic yard dumpster about half full of spent PPE/general trash that was open, unlabeled, and undated and screened hopper shown in photo 106.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 142

Photo File Name: 1010142

Date of Photo: 8/2/2023

Time of Photo: 10:32 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - Container of residue later determined to be dirt with piles of dirt on the side of it after emptying.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 144

Photo File Name: 1010144

Date of Photo: 8/2/2023

Time of Photo: 10:37 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA after some of the drums of heel flushes had been removed and taken to CHDP.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 145

Photo File Name: 1010145

Date of Photo: 8/2/2023

Time of Photo: 10:39 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA after some of the drums of heel flushes had been removed and taken to CHDP. Black liner was originally put in place as secondary containment for the drums when they first started. Spill kit in yellow drum inside the 4 HW tank containment liner. Cracks and spalling throughout storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 146

Photo File Name: 1010146

Date of Photo: 8/2/2023

Time of Photo: 10:39 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - The 4 HW tank secondary containment liner after started cleaning.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 149

Photo File Name: 1010149

Date of Photo: 8/2/2023

Time of Photo: 10:41 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - The 4 HW tank secondary containment liner after started cleaning. Liquid flowing outside of containment area toward the drums in the CSA was determined to be water flowing from a water line.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Clean Harbors Environmental Services, Inc.		
City: LaPorte	County/Parish: Harris	State: Texas



PHOTO No. 151

Photo File Name: 1010151

Date of Photo: 8/2/2023

Time of Photo: 10:42 AM

Photographer: Dedriel Gardner

Description: CHESI Tank Wash Area - CSA after some of the drums of heel flushes had been removed and taken to CHDP. Black liner was originally put in place as secondary containment for the drums when they first started. Cracks and spalling throughout storage area.

APPENDIX 2

Texas Registration Documents for CHESI Transfer and CHESI
Tank Wash

Central Registry Query - ID Search Results List

Your Search Returned **2** Records. Click on a column name to change the sort or an RN to view the regulated entity information. In some cases the Additional Id will be a link to the Additional Id Details.

1-2 of 2 Records

RN Number	Regulated Entity Name ▲	Location	County	Program	ID	Type	Status
RN100613595	CLEAN HARBORS ENVIRONMENTAL SERVICES	1501 WASHINGTON ST BRAINTREE MA 02184 7599		INDUSTRIAL AND HAZARDOUS WASTE	MAD039322250	EPA ID	ACTIVE
RN106254295	CLEAN HARBORS ENVIRONMENTAL SERVICES	42 LONGWATER DR NORWELL MA 02061 1612		USED OIL	MAD039322250	EPA ID	ACTIVE

1-2 of 2 Records

The following search criteria was entered:

Additional ID: MAD039322250

Search Type: full

[Site Help](#) | [Disclaimer](#) | [Web Policies](#) | [Accessibility](#) | [Our Compact with Texans](#) | [TCEQ Homeland Security](#)

[Contact Us](#) | [Central Registry](#) | [Search Hints](#) | [Report Data Errors](#)

Statewide Links: [Texas.gov](#) | [Texas Homeland Security](#) | [TRAIL Statewide Archive](#) | [Texas Veterans Portal](#)

© 2002 - 2023 Texas Commission on Environmental Quality

Last Modified 2023-01-11 - Production v2.1.5

Central Registry Query - Regulated Entity Information

Regulated Entity Information

RN Number: RN100613595

Name: CLEAN HARBORS ENVIRONMENTAL SERVICES [View Prior Names ...](#)

Primary Business: No primary business description on file.

Street Address: 1501 WASHINGTON ST, BRAINTREE MA 02184 7599

County:

Nearest City: BRAINTREE

State: MA

Near ZIP Code: 02184

Physical Location: No physical location description ON file.

Affiliated Customers - Current

Your Search Returned **1** Current Affiliation Records ([View Affiliation History ...](#))

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

1-1 of 1 Records

CN Number	Customer Name	Customer Role(s)	Details
CN600322796	CLEAN HARBORS ENVIRONMENTAL SERVICES INC	OWNER OPERATOR	

Industry Type Codes

Code	Classification	Name
484121	NAICS	General Freight Trucking
4213	SIC	Trucking

Permits, Registrations, or Other Authorizations

There are a total of **3** programs and IDs for this regulated entity. Click on a column name to change the sort order.

1-3 of 3 Records

Program ▲	ID Type	ID Number	ID Status
INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	MAD039322250	ACTIVE
INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION # (SWR)	41315	ACTIVE
USED OIL	REGISTRATION	A85606	INACTIVE

Central Registry Query - Regulated Entity Information

Regulated Entity Information

RN Number: RN111050555

Name: CLEAN HARBORS ENVIRONMENTAL SERVICES

Primary Business: No primary business description on file.

Street Address: 2027 INDEPENDENCE PKWY S # 100, LA PORTE TX 77571 9808

County: HARRIS

Nearest City: LA PORTE

State: TX

Near ZIP Code: 77571

Physical Location: No physical location description ON file.

Affiliated Customers - Current

Your Search Returned **1** Current Affiliation Records ([View Affiliation History ...](#))

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

1-1 of 1 Records

CN Number	Customer Name	Customer Role(s)	Details
CN600322796	CLEAN HARBORS ENVIRONMENTAL SERVICES INC	OWNER OPERATOR	

Industry Type Codes

Code	Classification	Name
562998	NAICS	All Other Miscellaneous Waste Management Services
7699	SIC	Repair Shops and Related Services

Permits, Registrations, or Other Authorizations

There are a total of **6** programs and IDs for this regulated entity. Click on a column name to change the sort order.

1-6 of 6 Records

Program ▲	ID Type	ID Number	ID Status
AIR NEW SOURCE PERMITS	PERMIT	173220	PENDING
AIR NEW SOURCE PERMITS	PERMIT	173276	PENDING
AIR NEW SOURCE PERMITS	REGISTRATION	166223	CANCELLED
AIR NEW SOURCE PERMITS	REGISTRATION	171315	ACTIVE
INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXR000085319	ACTIVE

INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION # (SWR)	97697	ACTIVE
-----------------------------------	-------------------------------------	-------	--------

[Site Help](#) | [Disclaimer](#) | [Web Policies](#) | [Accessibility](#) | [Our Compact with Texans](#) | [TCEQ Homeland Security](#)

[Contact Us](#) | [Central Registry](#) | [Search Hints](#) | [Report Data Errors](#)

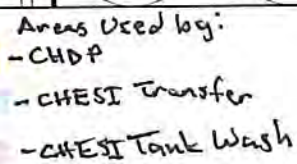
Statewide Links: **[Texas.gov](#) | [Texas Homeland Security](#) | [TRAIL Statewide Archive](#) | [Texas Veterans Portal](#)**

© 2002 - 2023 Texas Commission on Environmental Quality

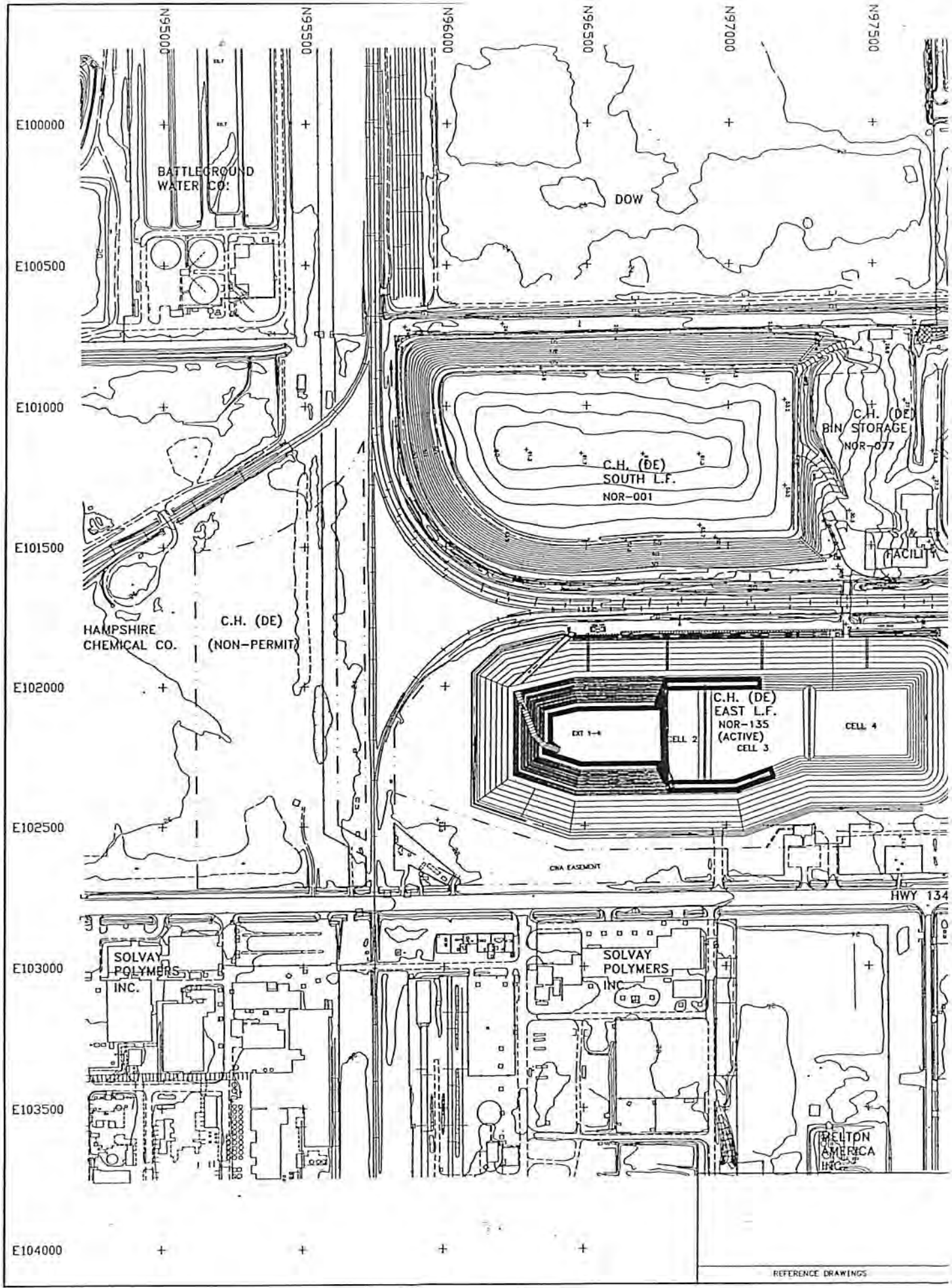
Last Modified 2023-01-11 - Production v2.1.5

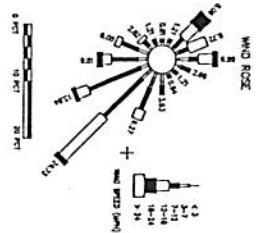
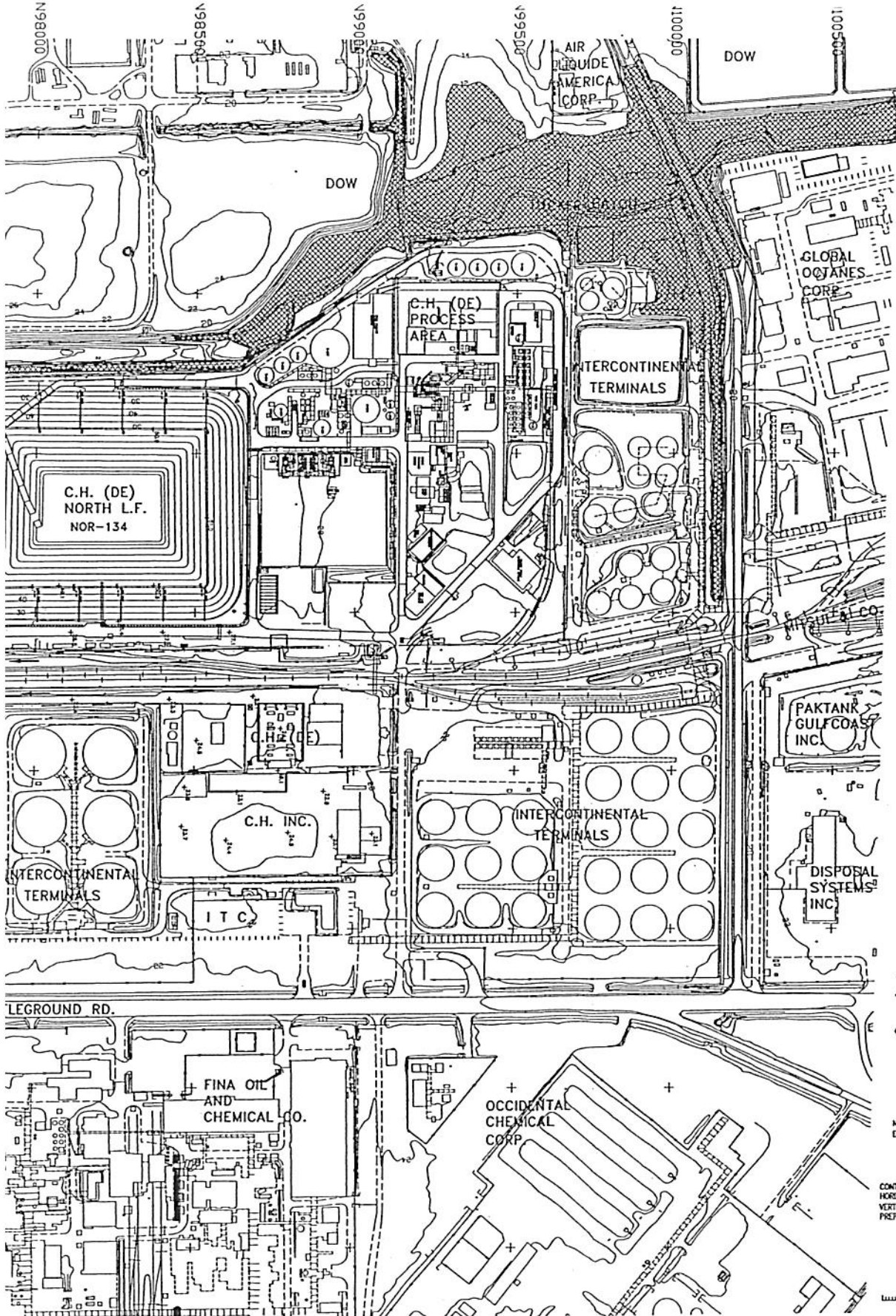
APPENDIX 3

Facility Layouts and Part B Permit Application Deed Map



7/31/23-8/2/23 RCMA Inspection



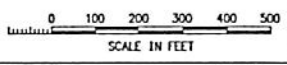


LEGEND

- PROPERTY LINE
- - - FENCE LINE
- - - INTERMITTENT DRAINAGE
- 100 YEAR FLOOD PLANE
ZONE AE - 12 FT. WGL
REF. FEMA MAP
NO. 48201C0930J
NOV. 6, 1995

NOTE: FENCE LINE FOLLOWS PROPERTY LINE
EXCEPT WHERE NOTED

CONTOUR INTERVAL - TWO FOOT
HORIZONTAL DATUM - PLANT COORDINATE SYSTEM
VERTICAL DATUM - MEAN SEA LEVEL
PREPARED FROM AERIAL PHOTOGRAPHY



REV.	DESCRIPTION	DRAWN BY	DATE	APPR. BY	WDS	REL	SCALE	DATE	DRAWING NO.	REV.
5	GENERAL REVISION	WDS	3/22/17	REL						
4	GENERAL REVISION	WDS	2/10/15	REL						
3	GENERAL REVISION	WDS	5/23/14	REL						
2	GENERAL REVISION	WDS	10/31/09	REL						
1	SITE TOPOGRAPHY UPDATE 1997	WDS	9/10/97	REL						
0	SITE TOPOGRAPHY 1991	WDS	12/31/91	REL						



TITLE
CLEAN HARBORS (DEER PARK)
SITE TOPOGRAPHY
100 YEAR FLOOD PLANE
SITE SURFACE DRAINAGE & INTERMITTENT STREAMS

DRAWING NO. H-001-CC-110-D

REV. 5

APPENDIX 4

Descriptions of Processes/Operations

7/31/2023 – 8/2/2023 RCRA Inspection

Descriptions of Processes/Operations for the Three CHESI Companies, LaPorte, Texas

Based on discussions with facility personnel and documents reviewed, following are process/operations descriptions for each company operating onsite (CHESI Transfer, CHESI Tank Wash, and CHDP).

A. CHESI Transfer

Onsite CHESI operates a transfer facility where they store roll-offs, tankers, and containers (e.g., drums) in trailers. Also, they have two sampling bays where they sample incoming loads. See Appendix 3 for facility layouts noting areas used and Photos 115, 132, and 136. CHESI Transfer has eight employees and one supervisor. They can work 24 hours, 7 days per week, but typically 6:30 a.m. to 6:30 p.m. Mr. Riffel explained the operations as follows:

- The tanker arrives onsite, and it is:
 - o Weighed, inspected, and the manifest paperwork completed by the CHDP Transportation Group (see Photo 119).
 - o Spotted (i.e., placed) in the 10-day storage yard depending on type (roll-off, trailer, or tanker).
 - o Sampled by a CHDP employee stationed onsite.
 - o If CHDP accepts the waste (i.e., signs the manifest as the designated facility), collected by a CHDP driver within 10 days and taken to CHDP for incineration.
 - o If CHDP does not accept the container, the CHDP Transportation Group contacts the CHESI salesman for that customer to determine how to handle the rejected waste.
- Although CHESI Transfer could accept HW that is sent to another TSD facility other than CHDP, it is very unlikely since CHDP is a large TSD facility that handles large volumes of waste. Mr. Riffel stated that it would be a “last resort type of thing” for that to happen. Mr. Riffel gave an example of a type of waste that could be sent to another TSD facility thru CHESI Transfer. It was for universal wastes (UW). Since paint related waste can only be declared UW in Texas, CHDP may accept paint waste onsite (i.e., sign the manifest as a designated facility) from a generator and then re-ship it as a UW paint waste to another destination facility. He stated that this could also be done for UW lamps. However, all these wastes sent to another TSD facility are accepted onsite at CHDP prior to being shipped to the other TSD facility.
- When the CHESI transportation company accepts waste from the generator, or another unrelated Clean Harbors transporter, CHDP starts tracking the manifest shipment in an internal tracking database (WINWEB). Every movement is tracked including each hub stop and trailer change. I selected six manifests (from the East Palestine Ohio train derailment) to review and upload to the online drive. These six manifests happened to be where CHESI signed as transporter #2 or #3, at which point the waste was placed at CHESI Transfer. Mr. Riffel stated that he knows this because there is no manifest history after CHESI signed it as the transporter (i.e., afterwards the waste was accepted by CHDP for incineration and the manifest was terminated).
- CHESI Transfer also imports HW from Mexico. Mr. Riffel stated that he would upload sample documents related to one of the import shipments.
- No vehicle maintenance occurs onsite.
- CHESI Transfer operates under CHDP’s contingency plan and training program.

B. CHESI Tank Wash

Onsite CHESI operates a transfer facility where they wash tankers (i.e., tankers and roll-offs) just for the Clean Harbors branches. See Appendix 3 for facility layouts and Photos 1, 48, 90, 119, 120, and 121. CHESI Tank Wash has eight employees and two supervisors (Michael Robbins, Branch Manager, and Jason Jones) that work 6:00 a.m. to 10:30 p.m., Monday thru Friday. Mr. Robbins, unless noted otherwise, explained the operations as follows:

- Currently they wash on a 2-bay concrete pad with berm under a canopy.
- About a year and half ago, this tank wash operation was originally set up to be a temporary operation for about three months, at the longest six months. However, it has remained in operation to date.
 - o They are in the process of building a permanent facility inside the existing building (see Photos 115 and 136) to start cleaning tankers commercially and not just for the Clean Harbors branches. The new facility is expected to be completed by September 2023.
- They are operating under a Clean Air Act (CAA) permit by rule (PBR).
- They accept tankers to wash with all types of last contained wastes including characteristic and listed HW. They do not clean product tankers.
- They have processed about 700 tankers total in the approximately year and a half of operating. They clean about 40 tankers per month.
- Most of the tankers are RCRA empty, although some are not. Mr. Robbins estimated about 98 percent are empty and two percent not empty. I asked for the past month of tank wash tickets and related manifests, and the last 10 for those that were not RCRA empty.
- The operation process is as follows:
 - o When one of the nationwide Clean Harbors branches determines that a tanker of HW or non-HW needs cleaning, they contact the generator of the container letting them know and get their permission to clean.
 - o That Clean Harbors branch contacts Mr. Robbins, usually by email, letting him know they have a tanker to be cleaned.
 - o CHESI Tank Wash then picks up the tanker (including if it is from CHDP) accompanied by a manifest and transports it back to CHESI Tank Wash.
 - o When the tanker arrives onsite, it is:
 - Weighed and placed in one of two wash bays for cleaning. It is not stored prior to being washed.
 - The tanker vapors are sent through a caustic scrubber followed by a carbon scrubber.
 - Steam may also be used to clean the tanker after which the steam is run through a tank of cold water to cool prior to the carbon filter.
 - Flushed with water to remove the heels which are accumulated in a 55-gallon plastic drum that contains about 25 gallons of absorbent.
 - Sometimes, but not often, they may need to shovel out residue that cannot be flushed out.
 - Washed, if needed with diesel which is also accumulated in the drum.
 - Flushed with water which is also accumulated in the drum.
 - This completes the wastes added into the drums of heels flush generated from each tanker. The drums from each cleaning are assigned an internal batch number which is painted on top of each drum (see Photo 22).

APPENDIX 4

- Rinsed with 14-18 percent caustic or detergent (I asked for the Safety Data Sheets to be provided).
 - To clean, the caustic or detergent is recirculated from its 800 to 1000-gallon storage vat, to the tanker, and back to its vat until spent (i.e., too diluted). Once spent, the caustic or detergent is discharged from the vat to one of the four HW tanks.
- Flushed with a final cold-water rinse that is discharged to the wash bay floor. The floor drains to a 2ft x 2ft x 3ft sump from which the wastewater is pumped to one of four HW tanks.
- Mr. Robbins stated that CHESI Tank Wash does not take possession of the heels (i.e., does not sign the manifest as the designated facility) removed from the empty and non-empty tankers. The heels are manifested to CHDP for incineration with the customer listed as the generator and CHESI as the transporter.
 - CHESI Tank Wash transports the cleaned tanker back to CH Branch.
- CHESI Tank Wash operates under CHDP's contingency plan.

C. CHDP

Onsite CHDP operates a permitted container storage area, the Transportation Group, and collects some of the HW generated onsite.

- The permitted container (roll-offs) storage unit is known as the Waste Receiving Pad [Permit #106/Texas Notice of Registration (NOR) #167]. See Appendix 2 for registration information, Appendix 3 for facility layouts, and Photos 60 and 61. See the Facility Audit Package, permit, and Part B permit application regarding CHDP and operations for the Waste Receiving Pad.
- Mr. Riffel and Mr. Robbins stated that all wastes generated onsite, including the general trash, is managed as HW. Mr. Riffel stated that CHDP has an employee that goes around once during each shift to collect the wastes from all the satellite accumulation areas at this CHESI site and CHDP. He stated that they do not track or log any of the wastes collected from the satellite areas as it is all handled the same (i.e., as HW incinerated).

CHDP Transportation Group – Kim Bravenec, Waste Receiving Supervisor, unless noted otherwise, explained the operations as follows:

- The Transportation Group employees work for CHDP. They handle the manifests, check-in the drivers/contractors/visitors, and conduct inspections on the trailers when the drivers check in.
- If an incoming manifest has not already been signed by a CHESI company, the Transportation Group signs the incoming manifest for CHESI Transfer as a transporter using the EPA ID #MAD039322250. For example, when an incoming load is brought onsite by an unrelated CHESI transporter, they sign it.
- The Transportation Group signs the incoming manifests for CHDP as the designated facility when the HW has been accepted by the plant.
- I reviewed randomly selected manifests for roll-offs and trailers onsite in the less than 10-day storage areas. I asked for review the WINWEB tracking information on manifests 017903329FLE, 008304425SKS, and 01845447FLE.

APPENDIX 4

- Ms. Bravenec stated that CHESI Tank Wash has two cases of manifesting involved and explained each as follows:
 - First case is where the tanker of HW is sent to CHESI Tank Wash from CHDP. Depending on if the tanker is RCRA empty or not, it is processed as follows:
 - If CHDP determines that the tanker is RCRA empty, but the generator request the container to be cleaned:
 - The Transportation Group scans a copy of the tanker's last contained waste manifest and gives it to CHESI Tank Wash.
 - The CHESI Tank Wash employee takes a copy of the manifest and collects the empty tanker from CHDP and brings it to CHESI Tank Wash for cleaning.
 - Once the tanker is cleaned, CHESI Tank Wash:
 - Makes a wash ticket including the date, customer name, chemical waste removed, and cleaning solution. This ticket is attached to the tanker.
 - Sends an email to that generator's CHESI Customer Service Representative (CSR) letting them know the tanker is clean and ready for pick up. The Transportation Group is copied on this email. See Appendix 4A for an example of email and related wash ticket documents.
 - Mr. Robbins stated that when the CSR branch receives the completion email along with the wash ticket, that branch creates and sends to CHESI Tank Wash the heels flush manifest and yellow/white HW drum labels with the date the drums were filled based on the wash ticket. The CSR branch signs these heels flush manifests on behalf of the generator and CHESI Tank Wash as a transporter. Mr. Robbins stated that sometimes the generator wants to sign their own manifests, so the manifest is FedEx to them for signature and returned for CHESI Tank Wash to sign as the transporter. The heels flush manifest is given to the Transportation Group for processing and to create the CHDP white barcoded heels flush drum labels. Mr. Robbins stated that CHESI Tank Wash does not ever take possession of the heels, i.e., does not sign the manifest as the designated facility.
 - Transports the tanker back to CHDP.
 - The customer picks up the cleaned tanker from CHDP.
 - If CHDP determines that the tanker is not empty:
 - The generator's CSR contacts the generator and determines if they want the tanker cleaned. If the generator wants to clean it, the customer rejects the manifested load to CHESI Tank Wash.

APPENDIX 4

- The Transportation Group creates this rejected manifest to send the tanker to CHESI Tank Wash.
- CHESI Tank Wash comes to the Transportation Group's office and signs out the non-empty tanker (i.e., signs the rejected manifest as a transporter). CHESI Tank Wash only signs out a tanker on a manifest if the customer says to clean a RCRA non-empty container. Otherwise, CHESI Tank Wash just receives a scan copy of the last contained waste manifest of the tanker to be cleaned.
- The CHESI Tank Wash employee takes a copy of the rejected manifest and collects the non-empty tanker from CHDP and brings it to CHESI Tank Wash for cleaning.
- Once the tanker is cleaned, the process is the same as above where CHESI Tank Wash creates a wash ticket, sends an email upon completion, and transports the container back to CHDP.
 - Ms. Bravenec stated that the Transportation Group does not receive a copy of the rejected manifest back when CHESI Tank Wash signs (as a transporter) out the non-empty container for cleaning and that she does not know what happens to it. I asked Mr. Robbins what they do with them, and he stated that CHESI Tank Wash keeps that copy of manifest.
- Second case is where the container of HW is sent to CHESI Tank Wash from the generator. This would happen if a container of HW was sent to CHDP for incineration and was returned to the generator after treatment. The generator then decides they should have had it cleaned so they send it to CHESI Tank Wash directly.
 - In this case, Mr. Robbins stated that they request the tanker's last contained waste manifest from the generator and call the CSR to let them know what happened. He stated that they do not clean any trailers without a last contained waste manifest for safety reasons.
- As an example, the wash ticket, completion email, container tracking ticket, and invoice for the tanker cleaned that day (8/1/23) were provided during the inspection (see Appendix 4A). It was RCRA empty, but the customer requested that it be cleaned.
- As an example, manifest 017903307FLE was provided during the inspection of a tanker that showed it was empty by the truck scale. The generator requested that it be cleaned. However, 12 drums of HW heels flush were generated. Therefore, the Transportation Group prepared a manifest for these 12 drums with the customer as the generator, CHESI Tank Wash as Transporter #1, and CHDP as the designated facility. CHDP Tank Wash did not have a new manifest created to sign out this trailer for cleaning since it showed RCRA empty by the scale. See Appendix 4B for the manifest 017903307FLE example and related wash ticket documents.
 - Ms. Bravenec stated that looking at manifest 017903382FLE alone, one would not be able to tell if the 12 drums came from an offsite generator customer or CHESI Tank Wash as they look the same.
- I requested two examples of where CHESI Tank Wash received RCRA non-empty containers and signed out the tankers.

APPENDIX 4A

Example of a Tank Wash Completion Email with Wash Ticket and an Empty
Tanker that Generated Heels

BRAVENEC, KIMBERLY L

From: Biles, Noah
Sent: Tuesday, August 1, 2023 9:04 AM
To: BROWN, LISA (Louisiana T&D); BUXTON, DINA CUPIT
Cc: Robbins, Michael; BRAVENEC, KIMBERLY L; Jones, Jason
Subject: SST-70-8015
Attachments: 8-1-23 SST-70-8015.pdf; 8-1-23 STT-70-8015.pdf

Trailer is clean and ready for pick up
Also, this unit has nontransferable stains
please advise
thanks
David,



Wash Ticket 015910547FLE

WIN ID

Date

August 1, 2023

Profile

Trailer

SST-70-8015

Sales Order

Customer:

Westlake

1,2-Dichloroethane

EPA ID:

Phone:

Code

Description

Caustic Wash

Cleaned by - _____

Clean Harbors (Deer Park), L.P. Container Tracking Ticket (CTT)

801

Washout ☐ Yes ☒ No

For Tankers Only: Temperature: 100 Load Type: BL

A. CONTAINER ENTRY- RECEIVING COORDINATOR

WO#: 2303459079

Inspection Expiration Date for tankers only (Excluding ISO's)!!! Must fill out and check either Current or Expired. If any one of the three inspections is expired, contact Supervisor. Do not receive the load.

Placard #: 1184 Placards All Four Sides ☐ Yes ☐ No ☐ Loaded Prior to VIK expiration date

1 year from date shown V.I.K.: - ☐ Current ☐ Expired BOL #: 4981017

2 year from date shown T: - ☐ Current ☐ Expired Container #: EXFL664608

5 year from date shown R: - ☐ Current ☐ Expired Profile #: 140110-000-BC

Loaded or M/T Receiver's Int.: JK Container Type: ISO Manifest #: 024930685JK

Customer's Name: Blue Cube City/State: Lake Jackson TX Carrier: CHT

Tractor#: 1399 Driver: Andie Galloway Equip. Owner: EXSIF

Arrival Date: 7/27/23 Arrival Time: 1348 Scheduled Date: 7/27/23

B. Operations-Direct Burn/Tank Farm Unloading / Bin Unloading/ Van Unloading

I have checked the above V.I.K. information and confirm that it has not expired: [Signature] (Operator signature)

Date: 7/30/23 Time: 0930

Does Container need a nitrogen blanket (check one): ☐ Yes ☒ No How many lbs: - Completed by Operator: -

Does Container require a washout (check one): ☐ Yes ☒ No Completed By Operator: -

Date of Discharge/ATU: 7/27/23 Time of Discharge: 1540 Equip. Failure: - Comments: -

Date Processing Started: 7/27/23 Time Started: 0925 Operator: AM Feed Port-Initial: 801

Weight Beginning: 17210 Unloading Area: 2nd Pad Unit #: 36 Gun #: 801 Tank #: -

Supervisor-Initials: - Comment/Problems-Initial: -

Date Emptied: 7/30/23 Time Emptied: 1745 Feed Port-Final: 801 Weight Ending: 16738165

Operator-Final: AM Supervisor-Final: DD Comment/Problems-Final: -

C. Operations-Diesel/Water Flushes and Mix Building Washout

(Note: RCRA Empty is <1 inch, or <125 pounds, and/or <15 gallons remaining in 5000 gallon containers)

(Flash must be <140 and pH between 4-11 to be washed into the Mix Building. Check the Waste Safety Sheet for instructions).

Diesel Flush (150 gallons): ☐ Yes ☒ No # of Flushes: - Flash: - pH: - Operator: -

Water Flush (300 gallons): ☐ Yes ☒ No # of Flushes: - Flash: - pH: - Operator: -

#1) Was Container washed: ☐ Yes ☒ No Date Washed: 7/30/23 Time Washed: - Gallons Used: -

#2) Is Container RCRA Empty: ☒ Yes ☐ No Per visual: ☐ Yes ☒ No Possible Heel Amount: -

#3) If not RCRA empty, estimated amount in gallons: 990 lbs Heel If unknown check here: ☒ and initial here: AM

(Unknown = cannot inspect due to nature of material; i.e. no sample/sample from burn line.)

#4) Is a nitrogen blanket on the Container: ☐ Yes ☒ No Did trailer blow Nitrogen when empty? ☐ Yes ☒ No Seals: ☐ Yes ☒ No

#5) Waste Problem Form Generated: ☐ Yes ☒ No Waste Problem Form Comment: -

CTT Form Completed By: AM Operator: AM Supervisor: DD Date Completed: 7/30/23

OPERATOR MUST SIGN!!!! SUPERVISOR MUST SIGN!!!!

D. CONTAINER RETURN TO CET FROM OPERATIONS-RECEIVING PERSONNEL

Date returned Empty: 7/31/23 Receiving Coordinator: AM

E. CONTAINER RELEASE EMAIL - RECEIVING PERSONNEL

Email to: DX Date Emailed: 7/31/23 Time Emailed: 0501 Receiving Coordinator Initials: AM

F. CARRIER ACCEPTANCE-RECEIVING PERSONNEL ONLY

Carrier: - Tractor #: - Driver's Name: -

Driver's Signature: - Date Departed: - Time Departed: -

2027 Independence Pkwy ■ La Porte, TX 77571 ■ (281) 930-2470



Quote 015910547FLE

Date August 1, 2023

Profile

Trailer SST-70-8015

Sales Order

WIN ID

Customer:

Westlake

Last Contained

1,2-Dichloroethane

EPA ID:

Phone:

Code	Description	Unit	Qty	Unit Rate	Sell
	Caustic		1.00		
	Deer Park Heel Drumming (	55gal	2.00		
	Drum Transfer fee		2.00		
	Absorbent		8.00		

Special Notes and Instructions

Once signed, please e-mail it to the provided address.

4.80%

Above information is not an invoice and only an estimate of serv

Please confirm your acceptance of this quote by sign

Thank you for your busin

Should you have any enquiries concerning this quote, please contact: Rot

1-800-368-5600

APPENDIX 4B

Example Manifest of an Empty Tanker that Generated Heels Returned to CHDP

Please print or type.

Form Approved. OMB No. 2050-0039

DE-659

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TXD980746643	2. Page 1 of 1	3. Emergency Response Phone (800) 453-3718	4. Manifest Tracking Number 017903382 FLE		
5. Generator's Name and Mailing Address Equistar Chemicals LP P.O. Box 2100 Bay City, TX 77414				Generator's Site Address (if different than mailing address) 17042 Texas Hwy 60 Bay City, TX 77414			
6. Transporter 1 Company Name Clean Harbors Environmental Services, Inc.				U.S. EPA ID Number MAD035322250			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Clean Harbors Deer Park, LLC 2027 Independence Parkway South La Porte, TX 77571 Facility's Phone: (281) 930-2300				U.S. EPA ID Number TXD055141378			

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type			D001	D002	D003
1.	RO, UN3286, WASTE FLAMMABLE LIQUID, TOXIC, CORROSIVE, N.O.S., (TOLUENE, TITANIUM TETRACHLORIDE), 3, (6.1), (8), PG I (D001), TOXIC-INHALATION HAZARD ZONE B	12	DF	3600	P	D001	D002	D003
2.						F005	0010212H	
3.								
4.								

14. Special Handling Instructions and Additional Information
1.366532 126DM ERG#131

0179033071E 2303465377 TNK 4379

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offor's Printed/Typed Name: **DIANNE JOBE OBO EQUISTAR**

Signature: *[Signature]* Month: **17** Day: **31** Year: **23**

16. International Shipments ☐ Import to U.S. ☐ Export from U.S.

Port of entry/exit: _____ Date leaving U.S.: _____

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: *[Signature]* Signature: *[Signature]* Month: **7** Day: **31** Year: **23**

Transporter 2 Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number: _____

18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____

Facility's Phone: _____

18c. Signature of Alternate Facility (or Generator) _____ Month: _____ Day: _____ Year: _____

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. **H040** 2. _____ 3. _____ 4. _____

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: *[Signature]* Signature: *[Signature]* Month: **08** Day: **01** Year: **23**

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 1	2. Page 1 of 1	3. Emergency Response Phone 1-800-482-5515	4. Manifest Tracking Number 017903307 FLE	
5. Generator's Name and Mailing Address Preston Chemicals LP 1000 E. Loop West Bay City, TX 77414 Generator's Phone: 979-240-1000 ATTN: Accounting			Generator's Site Address (if different than mailing address) 17042 Texas Hwy 01 Bay City, TX 77414			
6. Transporter 1 Company Name West Harbour Environmental Services Inc.			U.S. EPA ID Number M 4 1053 00050			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address D.E. Mann & Tower Park, LLC 2017 Independence Parkway South Bay City, TX 77571 Facility's Phone: 281-330-2200			U.S. EPA ID Number TX 0005 41575			
9a HM	9c U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
1	H201 CORROSIVE LIQUID FORMIC ACID, CORROSIVE N.O.S. (FORMIC ACID) (H201) CLASSIFICATION: HIGH HAZARD ZONE I			34,000		2001 DUCJ 0005 E005 001024 H
2						
3						
4						
14. Special Handling Instructions and Additional Information PO 4404974860, WO# 2303465377						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Bruce T. Hunter		Signature <i>Bruce T. Hunter</i>		Month Day Year 7 / 11 / 23		
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: Eugene J. Montreuil Signature: <i>Eugene J. Montreuil</i> Month Day Year: 7 / 11 / 23 Transporter 2 Printed/Typed Name: _____ Signature: _____ Month Day Year: _____						
18. Discrepancy 18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection Manifest Reference Number: _____ U.S. EPA ID Number: _____						
18b. Alternate Facility (or Generator) Facility's Name: _____ U.S. EPA ID Number: _____ Facility's Phone: _____ 18c. Signature of Alternate Facility (or Generator): _____ Month Day Year: _____						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. _____ 2. _____ 3. _____ 4. _____						
20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name: _____ Signature: <i>[Signature]</i> Month Day Year: 7 / 11 / 23						



ENVIRONMENTAL SERVICES

MANIFEST INFORMATION

Land Disposal Restriction
Notification Form

Page: 1 of 1

Printed Date: Feb 26, 2015

Generator: Equistar Chemicals Lp

Address: 17042 Texas Hwy 60
Bay City, TX 77414

Manifest Tracking Info.

017903407FLE

EPA ID #: TXD880788843

Sales Order No: 2303465377

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category:
1.	1	366532_128B	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

D002

D003

F005

EPA Waste SubCategory

High TOC Ignitable Liquids

Corrosive Characteristic

Water Reactives

NONE

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
TOLUENE	Y	Y	N

Certification

Applies to
Manifest Line
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

Waste analysis data, where available, is attached.

Signature: [Signature]Print Name: Colin ClarkTitle: Waste SpecialistDate: 2/11/27

POTENTIAL HAZARDS

HEALTH

- **TOXIC;** may be fatal if inhaled, ingested or absorbed through skin.
- Inhalation or contact with some of these materials will irritate or burn skin and eyes.
- Fire will produce irritating, corrosive and/or toxic gases.
- Vapors may cause dizziness or suffocation.
- Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

- **HIGHLY FLAMMABLE:** Will be easily ignited by heat, sparks or flames.
- Vapors may form explosive mixtures with air.
- Vapors may travel to source of ignition and flash back.
- Most vapors are heavier than air. They will spread along ground and collect in low or confined areas (sewers, basements, tanks).
- Vapor explosion and poison hazard indoors, outdoors or in sewers.
- Those substances designated with a (P) may polymerize explosively when heated or involved in a fire.
- Runoff to sewer may create fire or explosion hazard.
- Containers may explode when heated.
- Many liquids are lighter than water.

PUBLIC SAFETY

- **CALL EMERGENCY RESPONSE** Telephone Number on Shipping Paper first. If Shipping Paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.
- As an immediate precautionary measure, isolate spill or leak area for at least 50 meters (150 feet) in all directions.
- Keep unauthorized personnel away.
- Stay upwind, uphill and/or upstream.
- Ventilate closed spaces before entering.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Wear chemical protective clothing that is specifically recommended by the manufacturer. It may provide little or no thermal protection.
- Structural firefighters' protective clothing provides limited protection in fire situations ONLY; it is not effective in spill situations where direct contact with the substance is possible.

EVACUATION

- Spill**
 - See **Initial Isolation and Protective Action Distances** for highlighted materials. For non-highlighted materials, increase, in the downwind direction, as necessary, the isolation distance shown under "PUBLIC SAFETY".
- Fire**
 - If tank, rail car or tank truck is involved in a fire, ISOLATE for 800 meters (1/2 mile) in all directions; also, consider initial evacuation for 800 meters (1/2 mile) in all directions.



In Canada, an Emergency Response Assistance Plan (ERAP) may be required for this product. Please consult the shipping document and/or the ERAP Program Section (page 397).

EMERGENCY RESPONSE

FIRE

CAUTION: All these products have a very low flash point. Use of water spray when fighting fire may be inefficient.

Small Fire

- Dry chemical, CO₂, water spray or alcohol-resistant foam.

Large Fire

- Water spray, fog or alcohol-resistant foam.
- Move containers from fire area if you can do it without risk.
- Dike fire-control water for later disposal; do not scatter the material.
- Use water spray or fog; do not use straight streams.

Fire Involving Tanks or Car/Trailer Loads

- Fight fire from maximum distance or use unmanned hose holders or monitor nozzles.
- Cool containers with flooding quantities of water until well after fire is out.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks engulfed in fire.
- For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

SPILL OR LEAK

- Fully encapsulating, vapor-protective clothing should be worn for spills and leaks with no fire.
- **ELIMINATE** all ignition sources (no smoking, flames, sparks or flames in immediate area).
- All equipment used when handling the product must be grounded.
- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- Prevent entry into waterways, sewers, basements or confined areas.
- A vapor-suppressing foam may be used to reduce vapors.

Small Spill

- Absorb with earth, sand or other non-combustible material and transfer to containers for later disposal.
- Use clean, non-sparking tools to collect absorbed material.

Large Spill

- Dike far ahead of liquid spill for later disposal.
- Water spray may reduce vapor, but may not prevent ignition in closed spaces.

FIRST AID

- Ensure that medical personnel are aware of the material(s) involved and take precautions to protect themselves.
- Move victim to fresh air. • Call 911 or emergency medical service.
- Give artificial respiration if victim is not breathing.
- Do not use mouth-to-mouth method if victim ingested or inhaled the substance; give artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device.
- Administer oxygen if breathing is difficult.
- Remove and isolate contaminated clothing and shoes.
- In case of contact with substance, immediately flush skin or eyes with running water for at least 20 minutes.
- Wash skin with soap and water.
- In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin. • Keep victim calm and warm.
- Effects of exposure (inhalation, ingestion or skin contact) to substance may be delayed.

Equistar Chemicals, LP
Matagorda Plant
P.O. Box 2100, Bay City, Texas 77414

662H-L

lyondellbasell

DATE ID:T-4379 07/11/2023 02:24AM

34700 lb INBOUND KEY

CUSTOMERS NAME Clean Harbors

ADDRESS _____

COMMODITY V-133

CARRIER ID:T-4379 Clean Harbors REMARKS Seals

CONS NO IDENT DATE TIME

GROSS 68700 lb

TARE 34700 lb RECALLED KEYED

NET 34000 lb

03:08AM 07/11/2023

Out 1251293 x 9

GROSS

TARE - DRIVER ON ☒

OFF _____

NET @ _____ PER LB.

PRICE _____

SHIPPER Lyondell MTD

WEIGHER Frank

EC04003 (7/14)

4404994860

www.lyondellbasell.com

Main Gate Truck Scale
Clean Harbors Deer Park, LP , 2027 Battleground Rd
P.O. Box 609, Deer Park, TX 77536
(281) 930-4508 PH (281) 930-4516 FAX

Current Date 8/1/2023

Current Time 11:56

Current Weight Transaction

Bill of Lading	498324	Additional BOL	
Manifest#	017903307FLE	HO#	366532
Customer	Equistar Chemicals LP	Pickup Location	BAY CITY TX
Container	4379	Equipment Type	Tanker
Transporter to Facility	CHES		

Inbound Scale Operator	CG	Oubound Scale Operator	HS
Inbound Plant Driver	NF	Outbound Plant Driver	JB
Inbound Truck ID #	YM46	Outbound Truck ID #	35
In Date	7/12/2023	Out Date	7/14/2023
In Time	3:49	Out Time	19:09
In Weight	64180	Out Weight	30080

Net Weight 34100

Comments RTT

Scale operator signature of complete transaction :

No. of weights for this BOL = 1

Total Weight Summary

No	In Date	In Time	Operator	In Weight	Out Date	Out Time	Out Weight	Operator	Net Weight
1	7/12/2023	3:49	CG	64180	7/14/2023	19:09	30080	HS	34100

** This scale is calibrated every month by authorized personnel

APPENDIX 5

Daily Summaries

Gardner, Dedriel

From: Gardner, Dedriel
Sent: Monday, July 31, 2023 11:46 PM
To: Riffel, Bruce
Cc: Pandak, Debra (she/her/hers)
Subject: Daily Summary for 2023 RCRA inspection of Clean Harbors Environmental Services Inc. facility (CHESI) LaPorte, TX - July 31, 2023

Here is a brief summary of my notes from today's inspection. If there are any errors or omissions, please let me know.

Introduction

During the week of July 31, 2023, I, Dedriel Gardner, will be conducting an unannounced, inspection of the Clean Harbors Environmental Services Inc. facility (CHESI), located at 2027 Independence Pkwy S, in Deer Park, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). The inspection will include walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

Purpose

CHESI will be assessed for compliance with RCRA. The focus of the CEI will be RCRA hazardous waste management and compliance, specifically pertaining to transfer facilities located next to designated facilities.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Dedriel Gardner	Environmental Scientist – Sr. Inspector	US EPA Reg. 6	(281) 938-2133	gardner.dedriel@epa.gov
Bruce Riffel	Sr. Env. Compliance Manager (6 yrs in position/12 yrs total with company)	CHDP	281-930-2412	riffel.bruce@cleanharbors.com
Michael Robbins	Branch Manger (2 yrs in position & with company)	CHESI Tank Wash	__?__	__?__
Jason __?__	__?__	CHESI Tank Wash	__?__	__?__
Kim Bravence	Waste Receiving Supervisor (15 yrs in position/27 yrs total with company)	CHESI Transportation Group	__?__	__?__

Daily Summary

- Initial Entry to the facility – 9:30 a.m.

- o Arrived at CHESI and met Benji. I introduced myself and confirmed that I was at the right facility. He confirmed that I was and informed me that I needed to check-in at the trailer with the Transportation sign. I went there and Jenny informed me that CHESI was a separate company and that she was not sure where their management was located. She suggested I try the Clean Harbors located at 500 Independence Pkwy. I went there and the receptionist did not know who was in charge of that location. Therefore, I gave her Bruce Riffel's name and she called him for me to talk to. He stated that he was at the CHDP facility and that he would meet me at the CHESI transfer facility. I returned to the facility and introduced myself to Mr. Riffel and stated the purpose of the inspection. We then proceeded to his office at the CHDP administration building..
- o Watched safety video
- Opening meeting start – 10:30 a.m.
 - o Presented credentials to Mr. Riffel and informed him that I was there to conduct an inspection of the facility under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).
 - o Discussed the purpose of EPA's inspection – assessment of CHDP's compliance with its requirements under RCRA.
 - o Discussed the right of CHDP to assert a Confidential Business Information (CBI) claim for records requested by EPA (attached).
 - o Discussed the process for transferring electronic records – We agreed to use the EPA Microsoft OneDrive folder that was set up for the CHDP inspection on 4/19/23.
 - o I asked Mr. Riffel if he was not a part of CHESI as I was there to inspect CHESI. I informed him that I needed to speak with an official representative of that company that could speak for them. Mr. Riffel stated that would be him. I asked how if CHDP was not a part of CHESI. He stated that the CHESI transportation branch has their own compliance person, but he just does not know who that is. Mr. Riffel stated that the compliance personnel are regional type personnel and are not located near all of their facilities they are responsible for. Therefore, it is Clean Harbors policy that if needed, Mr. Riffel as a compliance person can represent them as he is the one located in the area. Mr. Riffel stated he can provide the info for the transportation operation, but not the tank wash operation as their employees is located onsite which I would meet during the visual inspection.

General Facility Information

- At this site are two CHESI companies, the transportation company operated under the MAD039322250 EPA ID# and the CHESI Tank Wash company operated under the TXR000085319 EPA ID# number (address 2027 Independence Pkwy S Suite#100, LaPorte, TX). The site is operated by CHESI, but Mr. Riffel was not sure who owned the property. He will provide this information.
- Mr. Riffel stated that CHESI transportation operates under EPA ID# MAD039322250. Therefore, I asked if this site is registered in the state of Texas as a registration could not be readily located in the TCEQ database. Mr. Riffel stated that he believes this facility has notified in Texas and it was prior to his time (he has worked for CHDP for about 12 years). Therefore, we looked online during the inspection and Mr. Riffel believed it to be the EPA ID # TXD000762948 related to the 7200 Rollins Road, Deer Park, TX because Rollins Env once owned the CHDP operation. However, he was not sure and would have to contact Corp to find out how they initially notified for this facility. Mr. Riffel also stated that around 2008 or 2011, the name of this area changed from Deer Park to LaPorte Texas. **(Area of Concern (AOC #1))**

Transportation Operations

- Have 8 employees and one supervisor. Can work 24/7, but typically 6:30 a.m. to 6:30 p.m.
- The operation process is as follows:
 - o The container arrives at this CHESI transportation/transfer facility.
 - It is weighed, inspected, and the manifest paperwork completed by the Transportation Group.
 - The container is then spotted (i.e., placed) in the 10-day yard.
 - A CHDP employee stationed at the CHESI transfer facility samples the container.
 - If CHDP does not accept the container, the Transportation Group contacts the salesman for that customer to determine how to handle the rejected waste.

- If CHDP accepts the waste (i.e., signs the manifest as the designated facility), a CHDP driver collects the container from the 10-day transfer area and takes it to CHDP for incineration.
- o Mr. Riffel stated that although this CHESI transfer site could accept other HW that is not sent to CHDP but to another TSD, it is very unlikely since CHDP is a large TSD facility that handles a large volume of waste. He stated that it would be a last resort type of thing for that to happen. An example he gave was UW paint related waste. Since paint related waste can only be declared UW in Texas, CHDP may accept paint waste onsite (i.e., sign the manifest as a designated facility) from a generator and then re-ship it as a UW paint waste to another destination facility. He stated that this could also be done for UW lamps. However, all of these wastes that are sent to another TSD are accepted by CHDP onsite prior to being shipped off-site.
- When CHESI Transportation accepts waste from the generator or another non-CH transporter, CHDP starts tracking the manifest shipment in WINWEB. Every movement is tracked including each hub and trailer changes. Examples of this manifest tracking was provided.
 - o I selected six manifests to review the tracking process. They happened to be where CHESI signed them as transporter #2 or #3, at which point the waste was spotted at this CHESI facility. Mr. Riffel stated that he knows this because there is no manifest history after CHESI signed it as the transporter (i.e., afterwards the waste was accepted by CHDP for incineration and the manifest was terminated).
- No maintenance occurs onsite.
- Mr. Riffel stated that they use CHDP's contingency plan and training plan.
- They do inspections of the outer trailers and not the individual containers inside.

Tank Wash Operations

- Have 8 employees that operate 6:00 a.m. to 10:30 p.m., Monday thru Friday.
- Currently they have a temporary two bay wash area under a canopy that was started about a year and a half ago (approximately __?__). Mr. Robbins stated that it was originally set up to be a temporary operation for about 3 months, 6 months at the longest. However, it has remained in operation to date.
- They are operating under a CAA permit by rule.
- Mr. Robbins stated that they have processed about 700 containers total (roll-offs and tanker trailers) in the year and a half of operating.
- Mr. Robbins stated that most of the containers are RCRA empty, although some are not RCRA empty. He stated that they may have large repack jobs of up to 150 drums. Mr. Robbins stated they do not take possession of the heels removed from non-empty containers and that they are manifested to CHDP for incineration.
- They are in the process of building a new permanent facility onsite inside a building to start cleaning containers (roll-offs and tanker trucks) commercially and not just for the CH branches.
- The initial notification in RCRAInfo was dated 6/11/2020 and the subsequent notification for the new facility was dated 11/4/2021. Mr. Riffel uploaded the TCEQ letter regarding the latest notification for 2027 Independence Pkwy, Suite #100. He stated that the tank wash part of CHESI is being notified as a separate site because of financial reasons, i.e., the washing side of the business will be profit generating as opposed to the transporting. Expect to be completed by __?__.
- The operation process is as follows:
 - o When one of the nationwide CH branches determines that a container (roll-off or tanker truck) of HW or non-HW needs cleaning, they contact the generator of the HW container letting them know the container needs to be sent for cleaning to get their permission. CHESI Tank Wash accepts all types of characteristic and listed HWs.
 - o The CH branch then contacts Mr. Robbins usually by email letting him know they have a container to be cleaned.
 - o CHESI Tank Wash then picks up the container (including from CHDP) accompanied by a manifest and transports it back to the CHESI Tank Wash facility.
 - o When it arrives onsite it is weighed.
 - o It is then placed in one of two bays where it is connected to a caustic scrubber to remove vapors.

- o It is then connected to a carbon scrubber.
 - Steam may be used to clean the container after which it is run through a tank of cold water to cool prior to running it through the carbon filter.
- o If the container is not RCRA-empty, a valve is then opened on the container to drain the heels (as is) into a 55-gallon plastic drum.
 - The drum is weighed and labeled with a HW label or non-HW label as applicable based on the manifest. These labels are dated with the date the drums were filled.
 - The drum is stored in the drum storage area located on the east side of the cleaning bays.
 - CHESI Tank Wash then contacts the Transportation for them to process the manifest and create a white bar coded CHDP drum label. The labels have a printed date that is the date the label was printed.
 - The drums are labeled with the CHDP bar coded label and then loaded onto a truck by CHESI Tank Wash
 - The drums are then transported by CHDP with a manifest to CHDP for incineration.
 - Sometimes, but not often, they may need to shovel out residue that cannot be drained out.
 - Mr. Robbins stated that CHESI Tank Wash does not ever take possession of the heels, i.e., does not sign the manifest.
- o After the container is RCRA empty or it arrives RCRA empty, it is then washed with a solution of 14-18% caustic or a detergent (SDS are to be provided) followed by a water rinse.
 - The wastewater is drained onto a concrete base that slopes to a sump.
 - The waste from the sump is pumped using a hose and diaphragm pump into a non-HW tank or one of three HW tanks. The tanks are all 8000-gallon above ground poly tanks. They sit on a ___?___ liner that is used as secondary containment.
 - The wastewaters from all four tanks are manifested to Delta for wastewater processing.
 - Mr. Robbins estimated that they generate about 8,000 to 15-20,000 gallons per month. He estimated of that about 60 to 70% would be the HW wastewaters.
- o CHESI transports the cleaned container (roll-off, tanker trailer) back to the CH branch.

Observations

Tank Wash Area

1. The two wash bays had not been used in about a week according to Mr. Robbins. I observed some liquid on the concrete wash bay. The concrete bays had some of the seams/cracks sealed as pointed out by Mr. Robbins. The sump contained some liquid with a sheen.
2. I observed one non-HW and 3 HW tanks. The HW tanks were not labeled as hazardous waste. At the time of the inspection, Mr. Robbins and Jason stated that the tanks were empty. They were last used about a week ago. Mr. Robbins stated that they conduct inspections on the tanks but do not keep a log of the amount of HW in the tanks. Mr. Robbins stated that he would have to check to see if they had any type of assessment conducted on the tanks when they were installed prior to use.
3. I observed residue and puddles of liquid in the liner area and the liner was folded over in one corner. Mr. Robbins stated that they last cleaned the liner about a month ago. He stated that when they clean the containers the wastewaters spray out of the hoses onto the liner which is why I see the duct tape on the hoses. He stated that it also sprays out of the top of the containers while they are being cleaned.

Transporter Records to be provided:

1. Manifest (Incoming & Outgoing)
 - a. Imports
 - b. WINWEB of sample tracking to CHDP that had hub stops.
2. Inspections (Containers, Emergency Equipment, Security, etc.) – they inspect the outer trailers and not the individual containers inside the trailers.
3. Contingency Plan – Mr. Riffel says they operate under CHDP's plan

4. Training Plan – Mr. Riffel says they are trained with CHDP
5. Preparedness & Prevention
6. Notification
7. Biennial/Annual Reports?
8. Any waste generated onsite determination (PPE)

Tank Wash Area to be provided:

1. All Manifests (Incoming & Outgoing)
2. Inspections (HW Tanks, Containers, Emergency Equipment, Security, etc.)
3. Contingency Plan
4. Training Plan
5. Preparedness & Prevention
6. Notification
7. Biennial/Annual Reports?
8. Tank Assessments?
9. SDS of caustic and detergent used to clean containers.
10. Waste determination documents (HW wastewaters, non-HW wastewaters, PPE, tank liner clean up residue, ____)

Daily Wrap up meeting

Departed Facility at approximately 2:40 p.m.

Thanks,

Dedriel Gardner

US EPA, Region 6 Houston Lab

ECAD/WSTEB

10625 Fallstone Road

Houston, TX 77099

(281) 983-2133

Gardner, Dedriel

From: Gardner, Dedriel
Sent: Wednesday, August 2, 2023 12:10 AM
To: Riffel, Bruce
Cc: Pandak, Debra (she/her/hers)
Subject: Daily Summary for 8/1/2023 RCRA inspection of Clean Harbors Environmental Services Inc. facility

Here is a brief summary of my notes from today's inspection. If there are any errors or omissions, please let me know.

Introduction

During the week of July 31, 2023, I, Dedriel Gardner, will be conducting an unannounced, inspection of the Clean Harbors Environmental Services Inc. facility (CHESI), located at 2027 Independence Pkwy S, in Deer Park, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). The inspection will include walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

Purpose

CHESI will be assessed for compliance with RCRA. The focus of the CEI will be RCRA hazardous waste management and compliance, specifically pertaining to transfer facilities located next to designated facilities.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Dedriel Gardner	Environmental Scientist – Sr. Inspector	US EPA Reg. 6	(281) 938-2133	gardner.dedriel@epa.gov
Bruce Riffel	Sr. Env. Compliance Manager (6 yrs in position/12 yrs total with company)	CHDP	281-930-2412	riffel.bruce@cleanharbors.com
Michael Robbins	Branch Manger (2 yrs in position & with company)	CHESI Tank Wash	__?__	__?__
Jason __?__	__?__	CHESI Tank Wash	__?__	__?__
Kim Bravence	Waste Receiving Supervisor (15 yrs in position/27 yrs total with company)	CHESI Transportation Group	__?__	__?__
Randolph Jackson	Lab Manager	CHDP		

Daily Summary

- Initial Entry to the facility – 8:20 a.m.
 - o Arrived at CHESI, signed in at the Transportation Office, and proceeded to the administration building to meet Mr. Riffel.
- Opening meeting start – 8:30 a.m.
 - o Mr. Riffel stated that he received my daily summary this morning and just started looking at it. He stated that he would review it and make comments as needed. He would also forward a copy to Mr. Robbins for his review. Later Mr. Robbins informed me that he received it and will review it and make comments as necessary.

General Facility Information

This site is operated by CHESI, but Mr. Riffel was not sure who owns the property. He will provide this information. **Doc Request** The parent company is Clean Harbors.

Regarding the three facilities operating on this fenced-in site:

- CHESI Transfer Facility – Mr. Riffel stated that he was able to locate where CHESI had notified for this CHESI Transfer facility in Texas. He stated that it is under EPA ID# MAD039322250 with Braintree, MA listed as the primary address and includes no physical address. He stated that they are not able to enter the Texas physical location because the system does not let one enter a Texas address for a MA EPA ID number. Also, they can only enter one address for one EPA ID number. The address used for this CHESI Transfer site is 2027 Independence Pkwy S, LaPorte, TX 77571 which is also used for the permitted CHDP site. Therefore, this CHESI Transfer facility uses the MAD039322250 ID number. Mr. Riffel provided me the Texas registration info for this site with the MA ID number that is registered as Texas RN100613595 and CN600322796.
- CHESI Tank Wash – The CHESI Tank Wash uses the 2027 Independence Pkwy S, LaPorte, TX 77571 address, however, Mr. Riffel stated that TCEQ told him you can only have one address per EPA ID number, therefore he made it 2027 Independence Pkwy S, Suite #100, LaPorte, TX 77571 in order to obtain a separate number for the tank wash operation.
- CHDP – CHDP uses 2027 Independence Pkwy S, LaPorte, TX 77571. The EPA ID number is TXD055141378.

Started the visual inspection about 8:45 a.m.

Transporter/Transfer Facility Operations

- There are no CHESI Transfer employees stationed at this CHESI Transfer facility. There are CHDP employees stationed at the facility to sample the incoming wastes for the CHDP lab.
- In the sampling bays where incoming loads are sampled, I observed:
 - o One open 1-cubic yard box about 1/3rd full of spent PPE. It was labeled HW and not dated. However, the total volume appeared less than a 55-gallon drum.
 - o Two open 1-cubic yard boxes of trash mixed with PPE labeled “no metals”. Mr. Randolph Jackson (Lab Manager) was called to answer questions regarding the wastes generated in the sampling bays. Prior to about a month ago, he was managing this area. Currently someone else is managing it, but Mr. Jackson was called as the other manager was new. Mr. Jackson stated that these were two boxes of general trash that were generated at the lab building inside the plant. They were being stored outside at the lab and getting rained on. Therefore, they were brought over to the sampling bays to get them out of the rain. He stated that they were non-HW. However, I observed apparent contaminated spent PPE in the boxes. I asked what the difference was between the spent PPE collected in these two boxes and that collected in the PPE HW box. Mr. Jackson was not sure and stated that the PPE may have been added by the construction workers building the new tank wash building. He, Mr. Riffel and I went to ask the construction workers, but Mr. Jackson stated that the right workers were not present. I informed them

that I would make this an AOC for a HW determination. However, Mr. Jackson stated that he would have the boxes returned to CHDP today (8/1/23).

- Prior to my leaving the facility, these two boxes and the box of HW PPE had been taken to CHDP.
 - Mr. Riffel stated that no paperwork accompanies the non-HW and HW from this CHESI Transfer facility to CHDP.
- Was a HW determination made on the spent PPE in the two general trash boxes prior to moving? Requesting the waste profile for this waste. **Doc Request**
- I observed cracks throughout the area where the various containers of wastes were being stored.
- I observed the fence line. There appears to be a fence along the east, west, and south sides. The fence on the north has three openings of which two have gates that remain open. The other has no gate.
 - o I observed signs posted on the north, south, and east side but spaced far apart.
 - o I observed no gate and no signs on the far west opening leading into the Transportation Office.
 - o Mr. Riffel provided information that there are cameras located all around the CHESI Transfer site. He stated that they can be reviewed if needed at any time and someone is at the facility 24/7.
- Mr. Riffel stated that they use CHDP's contingency plan and training plan.
- They do inspections of the outer trailers and not the individual containers inside.

BIN Roll-Off Storage Area

- This area is registered by CHDP as NOR #167. Mr. Riffel stated that he would look it up to determine if it is a permitted area or a <90 storage area. **Doc request.**
- It is a concrete contained area with a drainage and sump area located in the southwest corner.
 - o I observed cracks in this containment drainage area.
 - o I observed residue that Mr. Riffles stated was dirt being blown/tracked in the area.
- I observed various roll-offs of HW and PCB wastes liquids being stored.
 - o Ms. Bravence stated that she did not have the manifests for these containers as they had been accepted by the CHDP.
- I asked Mr. Riffel why CHDP still manages this BIN storage area and he stated he did not know as it was probably managed as such from a long time ago and was never changed.
- I selected the following roll-offs to review manifests and waste profiles **Doc request:**
 - o Container #VB12007.
 - o Container #CHVB0684 – leaking, although it was labeled as PCBs and was believed to be empty based on the sound when tapping on its side.
 - A catch container was placed under this container to catch any spills until it could be cleaned up
 - o Container #RT-25198, manifest #024041343JK
 - o Container #CHVB0230 – 5/8/23 – Construction debris – stain observed under west end.
 - o Manifest # 018168736FLE – Stain on west end of container.

Tank Wash Operations

- Mr. Riffel and I met Mr. Robbins near the Wash Bay.
- I asked Mr. Robbins if I needed to repeat the entry procedures of the inspection to him if they consider themselves separate companies. He stated no and that Mr. Riffel would be the person for the entry info. It should be noted that Mr. Riffel is listed as the facility contact on the notification for this company.
- Mr. Robbins stated that he had told me wrong regarding the process of the wash bay tanks as all of the wastewater is handled as HW. He clarified that the process is such:
 - o The heels are removed from the containers by opening a valve and draining the liquid into a drum (all drums are 55-gallons unless stated otherwise).
 - o The tanker is then given an initial cold-water flush (sprayed for about 3 seconds which would be about 50 to 60 gallons per wash). The initial flush is collected with the heels into a drum. These heels/initial rinse waters are manifested back to the customer.
 - o The containers are then cleaned using caustic or detergent depending on the last contained chemical. Hoses are attached to the container and the cleaner is circulated through the container and back into

the cleaner tank. When the caustic or detergent becomes spent, it is pumped to Tank #2 and then shipped to Delta for treatment. He did not know exactly how Delta treats the waste.

- I asked Mr. Robbins if a HW determination had been made on the spent caustic and detergent prior to being added into Tank #2 and he stated no. He stated that knowledge and analyses were conducted on the wastewaters leaving Tanks 1 thru 4.
- The containers are rinsed with cold water and the rinsate is collected in one of the four tanks. Today, Tank #2 contained wastes, but Mr. Robbins did not know how much. Tanks #1, 3 and 4 were empty according to Mr. Robbins.
- I observed a tanker trailer (#SST708015) in the bay for cleaning, although no one was working in the area at the time. Liquid was puddled on the pad. Mr. Rollins stated that they use a squeegee to remove the puddles. The sump that Mr. Rollins stated was about 2ft x 2ft x 3ft deep was full up to about 6 inches from the top. Two drums of heels had been generated.
 - It appeared that the hatches on all four tanks were open, i.e., the hatches were not screwed down. I asked Mr. Robbins if this was the case and he stated yes. He stated that this is because the tanks level gauges are too cloudy to see the levels. Therefore, they use a ladder to move from tank to tank to climb up on top of each tank and look inside the hatch to see how full it is.
 - Documentation on whether the tanks and ancillary equipment are subject to RCRA 40 CFR Subpart BB and CC air emissions requirements. **Doc Request**
 - I asked Mr. Robbins if the tanks had any controls on them and he stated no.
 - Mr. Riffel stated that the liner was made of HDPE and was about a foot high, but parts of the wall had collapsed.
 - The tanks were strapped down.
 - I asked Mr. Robbins how they account for potential incompatibles being added into the tanks. He stated that it is all just mostly water as the initial rinse is collected in with the heels and only the final rinses are accumulated into the tanks. He estimated the waste to be about 95% water and Mr. Riffel estimated it to be about 99% water. I asked for the waste profile information regarding this waste. **Doc Request**
- I observed cracks in the wash bay concrete pad.
- I observed spent PPE collected with the general trash in various containers.
- I observed an open unlabeled hopper of two distinct colors of residue (about ½ to 2/3rds of a 55-gallon drum) on the northwest side of the wash bay. Mr. Robbins stated that it contained some of the dirt that was piled in the area to fill in potholes. However, it did not appear to look like the piles as they contained rocks and a different color. He stated that it had been there a long time.
- Spent carbon is generated and sent to CHDP for incineration. Requests waste profile/HW determination documentation, generation rate, how managed onsite. **Doc Request**
- Mr. Riffel counted and estimated there to be about 397 drums in the Tank Wash Drum Storage Area east of the wash bay. Six of these drums had the white CHDP barcoded labels dated 7/3/23. Mr. Robbins and Mr. Jones stated that they had received some of the CHDP barcoded labels, labeled the applicable drums, and shipped them to CHDP today (8/1/23). They plan to have the remaining drums labeled and shipped to CHDP by tomorrow.
 - I observed potential incompatible products in the area.
 - I observed the concrete in the area in poor condition mostly around the seams.

Transportation Group Office

- Mr. Riffel and I met Kim Bravence, Waste Receiving Supervisor.
- The Transportation Group employees work for CHDP and handle the manifests. They also check-in the drivers, contractors and visitors and conduct inspections on the trailers when the drivers check in.
- The Transportation Group signs the incoming manifests for the CHESI Transfer facility as a MAD039322250 transporter (only if it had not already been signed by CHESI). They also sign for CHDP as the designated facility when the HW has been accepted by the plant.

- I reviewed randomly selected manifests for roll-offs on the southeast side of the site waiting to be sampled or have been sampled. Also, I reviewed randomly selected manifests for trailers onsite. I asked for the WINWEB tracking information on manifests 01793329FLE, 008304425SKS, and 01845447FLE. **Doc Request**
- Ms. Bravence explained CHESI Tank Wash manifest process as follows. She stated that there are two cases of manifesting involved.
 - One case is where the container of HW is sent to CHESI Tank Wash from CHDP.
 - If CHDP determines that the container is RCRA empty, but the generator request the container to be cleaned:
 - The Transportation Group scans a copy of the last contained manifest and gives it to CHESI Tank Wash.
 - The CHESI Tank Wash employee takes a copy of the manifest and collects the empty container from CHDP and brings it to the CHESI Tank Wash facility for cleaning.
 - Once the container is cleaned, CHESI Tank Wash:
 - Makes a wash ticket including the date, customer, chemical, and cleaning solution. This ticket is attached to the container.
 - Sends an email to the generator's CSR letting them know the container is clean and ready for pick up. The Transportation Group is copied on this email.
 - CHESI Tank Wash transports the container back to CHDP.
 - The customer picks up the cleaned container from CHDP.
 - If CHDP determines that the container is not empty:
 - CHESI's Customer Service Rep (CSR) for that generator, contacts the generator and determines if they want the container cleaned. If the generator wants to clean it, the customer rejects the manifested load to CHESI Tank Wash.
 - The Transportation Group creates this rejected manifest to CHESI Tank Wash.
 - CHESI Tank Wash comes to the Transportation Group's office and signs out the non-empty container. CHESI Tank Wash only signs out a trailer on a manifest if the customer says to clean out a RCRA non-empty container. Otherwise, CHESI Tank Wash just receives a scan of the last contain manifest of the container to be cleaned.
 - The CHESI Tank Wash employee takes a copy of the manifest and collects the non-empty container from CHDP and brings it to the CHESI Tank Wash facility for cleaning.
 - Once the container is cleaned, the process is the same as above where CHESI Tank Wash creates a wash ticket, sends and email, and transports the container back to CHDP.
 - Ms. Bravence stated that they do not receive a copy of the manifest back when CHESI Tank Wash signs out the non-empty container for cleaning (as a transporter) and that she did not know what happens to it. I asked Mr. Robbins what they do with them and he stated that CHESI Tank Wash keeps that copy of manifest.
 - How does this show that the HW from a non-empty container made it to a designated facility. **Doc Request**
 - As an example, manifest 017903307FLE was provided during the inspection as an example of a container that showed it was empty by the scale. The generator requested that it be cleaned. However, 12 drums of HW heels were generated from the cleaning. Therefore, the Transportation Group prepared a manifest for these 12 drums with the customer as the generator, CHESI Tank Wash as Transporter #1, and CHDP as the designated facility. CHDP Tank Wash did not have a new manifest created to sign out this trailer for cleaning since it showed RCRA empty by the scales.
 - Ms. Bravence stated that looking at manifest 017903382FLE alone, one would not be able to tell if the 12 drums came from an offsite generator customer or CHESI Tank Wash as they look the same.
 - CHESI Tank Wash hand carries the completed manifests for the heels/initial flushes to the Transportation Group and they use it to make the CHDP barcoded white container labels for CHESI Tank Wash.

- As an example, the wash ticket for the tanker trailer cleaned today, 8/1/23, the email, container tracking ticket, and invoice was provided during the inspection. It was RCRA empty, but the customer requested that it be cleaned.
- I requested two examples of where CHESI Tank Wash received RCRA non-empty containers and signed out the containers. **Doc Request**
- The second case is where the container of HW is sent to CHESI Tank Wash from the generator. This would happen if a container of HW was sent to CHDP for incineration and was returned after treatment. The generator then decides they should have had it cleaned so they send it to CHESI Tank Wash directly.
 - In this case, Mr. Robbins stated that they request a last contained manifest from the generator and call the CSR to let them know what happened. He stated that they do not clean any trailers without a last contained manifest for safety reasons.
- Ms. Bravence stated that they do not receive a copy of the manifest back when CHESI Tank Wash signs out the non-empty container for cleaning (as a transporter) and that she did not know what happened to them. I asked Mr. Robbins what they do with them and he stated that CHESI Tank Wash keeps the copy of the manifest.

Transporter Records to be provided:

1. Manifest (Incoming & Outgoing)
 - a. Imports
 - b. WINWEB of sample tracking to CHDP that had hub stops.
 - c. WINWEB tracking information on manifests 01793329FLE, 008304425SKS, and 01845447FLE
2. Inspections (Containers, Emergency Equipment, Security, etc.) – they inspect the outer trailers and not the individual containers inside the trailers.
3. Contingency Plan – Mr. Riffel says they operate under CHDP's plan
4. Training Plan – Mr. Riffel says they are trained with CHDP
5. Preparedness & Prevention
6. Notification
7. Biennial/Annual Reports?
8. Any waste generated onsite determination (PPE, lab waste) and generation rate

Tank Wash Area to be provided:

1. All Manifests (Incoming & Outgoing)
2. Inspections (HW Tanks, Containers, Emergency Equipment, Security, etc.)
3. Contingency Plan
4. Training Plan
5. Preparedness & Prevention
6. Notification
7. SOPs for waste management
8. Biennial/Annual Reports?
9. Tank
 - a. Assessments?
 - b. BB & CC evaluation?
 - c. Waste determination - % water; organics
10. SDS of caustic and detergent used to clean containers.
11. Waste determination documents (HW wastewaters, PPE, tank liner clean up residue, spent caustic, spent detergent, spent carbon, etc.)

Areas of Concerns are to be discussed tomorrow.

Daily Wrap up meeting

Departed Facility at approximately 2:40 p.m.

Thanks,
Dedriel Gardner
US EPA, Region 6 Houston Lab
ECAD/WSTEB
10625 Fallstone Road
Houston, TX 77099
(281) 983-2133

Gardner, Dedriel

From: Gardner, Dedriel
Sent: Wednesday, August 2, 2023 10:57 PM
To: Riffel, Bruce
Cc: Pandak, Debra (she/her/hers)
Subject: Daily Summary for 8/2/2023 RCRA inspection of Clean Harbors Environmental Services Inc. facility

Here is a brief summary of my notes from today's inspection. If there are any errors or omissions, please let me know.

Introduction

During the week of July 31, 2023, I, Dedriel Gardner, will be conducting an unannounced, inspection of the Clean Harbors Environmental Services Inc. facility (CHESI), located at 2027 Independence Pkwy S, in Deer Park, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). The inspection will include walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

Purpose

CHESI will be assessed for compliance with RCRA. The focus of the CEI will be RCRA hazardous waste management and compliance, specifically pertaining to transfer facilities located next to designated facilities.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Dedriel Gardner	Environmental Scientist – Sr. Inspector	US EPA Reg. 6	(281) 938-2133	gardner.dedriel@epa.gov
Bruce Riffel	Sr. Env. Compliance Manager (6 yrs in position/12 yrs total with company)	CHDP	281-930-2412	riffel.bruce@cleanharbors.com
Michael Robbins	Branch Manger (2 yrs in position & with company)	CHESI Tank Wash	_?_	_?_
Jason Jones	_?_	CHESI Tank Wash	_?_	_?_
Kim Bravence	Waste Receiving Supervisor (15 yrs in position/27 yrs total with company)	CHESI Transportation Group	_?_	_?_
Randolph Jackson	Lab Manager	CHDP		

Steven Banister	Incinerator Manager II	CHDP	281-930-2370	Banister.steven@cleanharbors.com
Daniel Tauriello	General Manager	CHDP	281-930-2467	Tauriello.daniel@cleanharbors.com

Daily Summary

- Initial Entry to the facility – 8:03 a.m.
 - o Arrived at CHESI, signed in at the Transportation Office, and proceeded to the administration building to meet Mr. Riffel.
- Opening meeting start – 8:10 a.m.
 - o Mr. Riffel stated:
 - He had uploaded some of the requested information.
 - The BIN storage area is a permitted storage area and not a <90-day area.
 - Therefore, I asked for the permit operations regarding this BIN storage area.
 - He mentioned that they have the permit and Part B application electronically. Therefore, I asked for a copy to be uploaded. However, since it is a large file, he stated that it may take time. However, he tried to load part of it during the inspection and it did not take long. Even so, at this time I just asked for the part that discusses the BIN storage area and he could load the rest later, minus the modifications/addendums. If any of that is needed, we agreed that I will just call and ask him for that section.
 - They had ordered more warning signs to be posted around the facility.
 - They do inspections of the individual containers inside the trailers when they are plant received.
 - I showed him facility layout that I had annotated showing the fence and what areas are being operated by which CH company. He asked that I show it during the exit conference to Mr. Tauriello as he may know about the property line.
 - The PPE and lab wastes had been shipped to CHDP for incineration. He stated that they do not track satellite wastes generated. They just have an employee that goes around once during each shift to collect the waste from all of the satellite accumulation areas. He stated that the waste profile of it would be the same as CHDP's waste PPE and lab waste. He also stated that they will stop using the 1-cubic yard boxes to accumulate the waste and only use drums. This is because they do not want to have a <90-day storage area at that location since they cannot get a ID number to register it.

General Facility Information

There are the three facilities operating within the security fence around this site:

- CHESI Transfer Facility
- CHESI Tank Wash
- CHDP

Mr. Riffel looked at the deed in their permit application and determined that Clean Harbors, Inc. (the parent company) was the property owner of this site. He also provided me the deed map during the inspection showing Clean Harbors, Inc. as the property owner. He informed me that he would look at their property tax information and let me know what is says.

Started the visual inspection about 9:00 a.m.

Transporter/Transfer Facility Operations

- On the way to the area, we met Mr. Banister at his office to show me the security cameras that monitor and record this site:
 - o The facility is mostly surrounded by a chain link fence. The north and west side fences have openings.

- The north side fence has three openings of which two have gates. The gates are not typically closed because trucks are going in and out throughout the day, more traffic during the day than at night. The far west opening does not have a gate.
 - The northwest side of the fence had been removed around 2021 when the current modular building was installed for the Transportation Offices.
- o However, the site is monitored by cameras that make recordings that are saved for about a month. Any activities may be played back on the cameras. Mr. Banister showed me all the camera angles that are being recorded and provided me a screen shot of each.
- o There is a CHDP employee onsite 24/7 as incoming waste loads may be received onsite 24/7, although they try to get them to arrive during receiving hours (about 6:00 a.m. to 6:00 p.m.) but that may not always be possible.
 - This employee also conducts walk throughs one to two times per night and the shift supervisor also visits the site about two times per night.
- o Mr. Riffel stated that someone is also onsite 24/7 based on the scale may be used 24/7 by CHDP who processes waste 24/7 and waste has to be weighed as needed. Mr. Banister showed me the previous night where trucks periodically went in and out of the site during the night.
- o Also, a fuel tank is located onsite for vehicles to refuel 24/7.
- o The employees carry two-way radios.
- o The employees are trained regarding security onsite.
- I observed the signs posted near the far west opening that did not have a gate. It did not have a warning sign near it.
- Mr. Jackson met me and Mr. Riffel at the Transporter/Transfer facility.
- I asked him to look at the facility layout (along with Mr. Robbins and Mr. Riffel) I had color coded to see if it was correct on company usage. Mr. Riffel stated that the building will be all tank wash.
- He provided the following information regarding the PPE and lab waste generated onsite:
 - o They generate about one drum per day that would weigh about 25 pounds per day. He stated that this would be based on a 7-day week. This would amount to about 750 pounds per month. Mr. Riffel stated that he would track this waste stream to verify its generation rate.
- I asked for examples of import manifests.

BIN Roll-Off Storage Area

- Mr. Riffel stated that this was a permitted area.
- The area was being cleaned up at the time of the inspection.
- Mr. Riffel stated that two of the roll-offs that appeared to be leaking were removed. The last container I informed him of was not moved yet (Manifest # 018168736FLE).

Tank Wash Operations

- Mr. Riffel and I met Mr. Robbins at the facility.
- Mr. Robbins stated that the wash process is used the same no matter if the container RCRA empty or non-empty. Mr. Robbins estimated that they clean about 98% RCRA empty containers and 2% non-RCRA empty. He clarified the container wash process as follows:
 - o Vapors are sent through the scrubbers.
 - o It is flushed with water which is accumulated in a drum.
 - o If needed, it is washed with diesel which is accumulated in a drum.
 - o It is flushed with water which is accumulated in a drum.
 - o It is rinsed with caustic or detergent. The caustic and detergent are recirculated through its own 800 to 1000-gallon storage vat until spent (i.e., too diluted). Once spent it is discharged to one of the HW tanks.
 - o It is given a final cold-water flush that is discharged to the floor that drains to a sump and is pumped to one of the HW tanks.
- Mr. Robbins stated that they do not track the amount of heels removed, However, the number of drums on the wash ticket would contain only about 25 gallons of heels as a drum is filled with about 25 gallons of absorbent

because CHDP can handle solids more readily. I had requested an inventory of the drums in storage at the start of the inspection on 7/31/23. Mr. Robbins and Jones provided me a sample as I requested of what would be provided. This included a spreadsheet showing the date the drums were filled based on the wash ticket, the original manifest number, trailer number, Number of heel drums generated, the assigned internal CHESI Tank Wash batch number (the number on top of the drum lids), customer of the CH branch that sent the trailer (i.e., generator), and CH branch owner.

- o Mr. Robbins also clarified that when CHESI Tank Wash send the email to the CSR at the branch, the CH branch completes the yellow HW drum labels with the date the drums were filled based on the wash ticket and completes the manifest. The labels and manifests are emailed to CHESI Tank Wash to use. CHESI Tank Wash signs these manifests as a transporter. He stated that sometimes the generator wants to sign their own manifests as the generator, so the manifest is FedEx to them for signature and returned for CHESI Tank Wash to use and sign as transporter. This is the manifest given to the Transportation Group to create the CHDP white barcoded labels.
- I reviewed the waste streams generated with Mr. Robbins to include container heels, wastewater, spent PPE, spent caustic, spent detergent, residue accumulated in the tanks' containment liner, spent carbon, and caustic scrubber waste.
- I asked for the HW determination of the spent caustic and detergent at the point of generation prior to being mixed into the HW tanks. Mr. Robbins and Mr. Riffel stated that it is the same as the wastewater being shipped out of the tanks. Mr. Riffel stated that this is because they based their HW determination on a worst-case scenario. Therefore, the range would include the spent caustic and spent detergent.
- Mr. Robbins did not know the amount of residue accumulated in the tanks. He stated that the tanks are being rented.
- They started cleaning out the tank liner on the south and east sides. Mr. Robbins stated that they will be using only two tanks and adding a concrete secondary containment for the HW tanks.
- The waste in the screened hopper that was two colors Mr. Robbins stated was dirt that was sent to CHDP for incineration.
- Another approximately 100 drums of heels had been shipped to CHDP. CHESI Tank Wash expected to transport the remaining drums onsite to CHDP today (8/2/23).
- All waste generated onsite, including general trash, is handled as HW and sent to CHDP for incineration. Mr. Robbins stated that they have a Waste Management dumpster but they do not ship any waste to them as it is all sent to CHDP.
- Mr. Riffel stated that he believes they addressed the RCRA CC air emissions requirements when they obtained their CAA permit by rule. He stated that they would not be subject to Subpart BB as the waste does not have enough organics.
- Mr. Robbins stated that they have 10 employees (8 cleaners, Mr. Jones, and Mr. Robbins). The employees that could sign the manifest would be Noah Biles, David Richard, Jason Jones, and Michael Robbins.

Closing Conference

- Messrs. Riffel, Robbins, and Tauriello attended.
- I provided Mr. Robbins and Mr. Tauriello a confidentiality notice. They each signed noting no confidential information was obtained.
- **Requested Documents** – I provided Mr. Riffel and Mr. Robbins a list of documents to provide.
- **Areas of Concern (AOCs)** – I informed them that I would not be discussing all the potential AOCs at this time as EPA will be reviewing additional information regarding how the site should be regulated. This included whether it is operating as one site or three companies operating independently on one site. Also, whether they meet the transfer facility criteria. In addition, looking at having a transfer facility located contiguously to a designated facility. Even so, the potential AOCs discussed (whether they would be viewed as one site or separately, a transfer facility, and/or a TSD facility) included the following: operating without a permit (i.e., storing over time limit), container management (fully dating, good condition, and closed), tank management (adequate secondary containment, labeling, and controls), security signs, potential incompatibles in container and tank storage areas, and condition of the BIN permitted secondary containment area.

Departed Facility at approximately 1:33 p.m.

Thanks,
Dedriel Gardner
US EPA, Region 6 Houston Lab
ECAD/WSTEB
10625 Fallstone Road
Houston, TX 77099
(281) 983-2133

APPENDIX 6

Waste Table

APPENDIX 6 – WASTE TABLE

#	WASTE NAME	GENERATION PROCESS	FACILITY'S HAZ. WASTE DETERMINATION	ESTIMATED GENERATION RATE & AMOUNT ACCUMULATED ON-SITE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Heels Flush	<u>Tank Wash Area</u> – In the wash bays, after the tanker vapors are released to a caustic and carbon scrubber, the heels are flushed from RCRA empty and non-empty tankers into a drum containing about 25 gallons of absorbent as follows: a. A water flush. b. A diesel flush if needed. c. A water flush. Mr. Robbins stated that absorbent is added because CHDP can handle solids more easily than liquid. If necessary, some of the heels may have to be shoveled out but this is not common.	The heels are managed the same as stated on the tanker's last contained waste manifest. Therefore, the determinations can range from various types of hazardous waste to non-hazardous waste. See discussion below.	The generation rate varies based on the type of tankers being cleaned. See discussion below. I observed approximately 397 55-gallon drums on-site as discussed below.	The heels flush is drained into 55-gallon drums half filled with absorbent and stored in the container storage area (CSA) to the east of the wash bays on concrete (see Appendix 3 for facility layouts). The drums are labeled with a yellow/white hazardous waste label when received from the Clean Harbors branch and then later a white CHDP barcoded label. They are then loaded onto a truck by CHESI Tank Wash when time for shipment.	The heels flush is transported by CHDP with a manifest (the customer listed as the generator and CHESI as the transporter) to CHDP for incineration.

Hazardous Waste Determination Discussion – As a transfer facility, Mr. Robbins stated that CHESI Tank Wash does not take possession of the heels removed from the empty and non-empty tankers and they are managed the same as the tanker's last contained waste manifest. Mr. Riffel stated that the Department of Transportation (DOT) description on the incoming manifest would not change even with the addition of water, diesel, and/or absorbent based on the main constituents would be the same. I asked for the safety data sheet (SDS) of the diesel used for flushing. Six chemical SDSs used in the washing process were uploaded during the inspection. However, clarification/verification is needed on which SDS is the diesel and what the other chemicals are used for. Since it was not clear how all six chemicals are used and four of the SDSs listed proprietary constituents, I noted the heels flush hazardous waste determinations as a concern to verify representativeness. **(AOC #2.a)**

Generation Rate/Amount Accumulated Onsite – Mr. Robbins stated that they may have large repack jobs (i.e., cleaning out heels) of up to 150 drums. He stated that they do not track the quantity of heels in the tanker when it arrives onsite for cleaning. However, the total number of heels flush drums generated is stated on the wash ticket, although each drum contains only about 25 gallons of heels flush (i.e., heels, water, and diesel if needed) plus 25 gallons of absorbent.

On July 31, 2023, I observed approximately 397, 55-gallon drums of heels flush in the CSA as estimated by Mr. Riffel (see Appendix 3 for facility layouts and Photos 18, 22, 23, and 45). Mr. Robbins stated that none of the drums are empty, i.e., all are full to partially full. I requested an inventory of the drums in storage at the start of the inspection on July 31, 2023. Since Jason Jones (a CHESI Tank Wash supervisor) was in the process of updating the inventory during the inspection, I asked Mr. Robbins and Mr. Jones for a partial inventory of what would be provided and received Appendix 6A. It included a spreadsheet showing the date the drums were filled based on the wash ticket, the original manifest number, trailer number being cleaned, quantity of drums of heels flush generated, the assigned internal batch number, the Clean Harbors' branch customer that sent the trailer (i.e., generator), and the Clean Harbors' branch owner.

APPENDIX 6 – WASTE TABLE

#	WASTE NAME	GENERATION PROCESS	FACILITY'S HAZ. WASTE DETERMINATION	ESTIMATED GENERATION RATE & AMOUNT ACCUMULATED ON-SITE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
I observed the following regarding the approximately 397, 55-gallon drums being stored in the CSA: - At least 144 drums stored over 10 days dating back to May 20, 2023 (see Appendix 6A for partial inventory and Photos 18, 22, 23, 25, 30, 32, 33, and 36). (AOC #2.b) - Drums labeled with yellow/white hazardous waste labels that contained partial dates (month/day), except one drum label had no date (see Photo 33). Also, the approximately 14 drums generated that day (July 31, 2023) had no label or date. As explained in Appendix 4, labels with dates are sent by the CH branch after they receive the wash ticket. (AOC #2.b) - All but 6 drums were awaiting a CHDP white barcoded label. The 6 white barcoded labels were dated 7/3/23 (see Photos 32 and 91). - Concrete in the CSA apparently unsealed/uncoated and has cracks and spalling as shown in Photos 18, 22, 23, 42, 45, 91, 134, 144, and 145. Mr. Robbins stated that the plastic liner I observed on part of the ground after some of the drums were removed (see Photos 42, 145, and 151) was originally put in place as secondary containment for the drums when they first started. However, they quickly outgrew it within three weeks of operating. (AOC #2.b) - Potential incompatibles being stored including drums of corrosives (Meta-Phos - phosphoric acid) near chlorinated compounds (see Photos 25, 30, 36, 44, and 45). (AOC #2.b) Dyna Strip 777 Presolve product drums were being stored in the area, but they were empty. On August 1, 2023, Mr. Robbins and Mr. Jones stated that they had received some of the CHDP barcoded labels, labeled the applicable drums, and shipped them to CHDP that day (August 1, 2023) (see Photo 134). Also, two drums of heels flush generated that day was labeled and dated with the year included (see Photos 87 and 89). They planned to have the remaining drums labeled and shipped to CHDP by the next day (August 2, 2023). On August 2, 2023, another approximately 100 drums of heels flush had been shipped to CHDP according to Mr. Robbins (see Photos 144, 145 and 151). CHESI Tank Wash also expected to transport the remaining drums to CHDP that day (August 2, 2023).						

APPENDIX 6 – WASTE TABLE

#	WASTE NAME	GENERATION PROCESS	FACILITY'S HAZ. WASTE DETERMINATION	ESTIMATED GENERATION RATE & AMOUNT ACCUMULATED ON-SITE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
2	Wastewater	<u>Tank Wash Area</u> – In the wash bays after the heels have been flushed out, wastewater is generated from washing the tankers which are all RCRA empty at this point. The tankers are washed with 14-18 percent caustic or detergent (the two SDSs were uploaded during the inspection). The wastewater includes: a. Spent caustic generated when caustic is recirculated from its 800 to 1000-gallon storage vat, to the tanker, and back to its vat until spent (i.e., too diluted). b. Spent detergent generated when detergent is recirculated from its 800 to 1000-gallon storage vat, to the tanker, and back to its vat until spent (i.e., too diluted). c. Final cold-water flush. d. Wastewater from power washing the floor after each tanker cleaning.	Mr. Robbins stated that all the wastewaters are handled as hazardous waste. He stated that it was analyzed however, waste analyses were not provided. He also showed me a copy of a manifest of wastewater being manifested as a D002 (corrosive), D004 (arsenic), D028 (1,2-Dichloroethane), and D040 (trichloroethylene) hazardous waste. See discussion below.	Based on the latest manifests provided during the inspection, they last manifested on 7/28/23 – 7000 gallons; 7/19/23 – 7000 gallons; and 7/18/23 – 7000 gallons. I requested all the outgoing manifests to be provided. The amount of waste currently in the 4 hazardous waste tanks was unknown other than all, but Tank #2, was believed to be empty of wastewater since they recently had a shipment and only cleaned one tanker since then. However, all except maybe Tank #1 may contain an unknown amount of sludge bottoms.	Once the caustic and detergent are spent, they are discharged from the vat onto the concrete floor that slopes toward a 2ft x 2ft x 3ft deep sump. The spent caustic and detergent are pumped from the sump using a hose and diaphragm pump into hazardous waste Tank #2 (see Photo 2). The cold-water rinse wastewater is also discharged to the floor and pumped to the sump, prior to being pumped into one of 4 HW tanks (see Photos 2). The floor puddles in areas and therefore the wastewater may have to be pushed toward the sump using a squeegee. See discussion below regarding the 4 hazardous waste tanks.	The wastewater is manifested to Delta Water Processing LLC, Houston, Texas for wastewater processing. Mr. Robbins and Mr. Riffel did not know how Delta manages the wastewater other than the treatment code listed on the manifest (H081 – biological treatment). I asked for this information to be provided.

Hazardous Waste Determination Discussion – Mr. Robbins stated that all the wastewaters accumulated in the four hazardous waste tanks are handled as hazardous waste. He stated that it is based on analyses of a wastewater sample taken from the tanks. I asked Mr. Robbins if a hazardous waste determination had been made on the spent caustic and detergent prior to them being added into Tank #2 (i.e., at the point of generation prior to being mixed into the hazardous waste tanks) and he stated no. However, he stated that knowledge and analyses were used to make a hazardous waste determination on the wastewaters leaving hazardous waste tanks #1 thru #4. Mr. Robbins and Mr. Riffel stated that the spent caustic and detergent hazardous waste determination would be the same as the wastewater being removed from the hazardous waste tanks. Mr. Riffel stated that this is because they based their hazardous waste determination on a worst-case scenario that includes a concentration range that is conservative. Therefore, the spent caustic and detergent concentration would fall into that hazardous waste determination range. However, it appears that the hazardous waste determination for this waste stream could vary depending on the type of tankers being cleaned. Mr. Robbins did not believe so as he stated that the wastewaters being discharged from that final rinse would be 95 percent water. Mr. Riffel believed it would be 99 percent water. I asked for the waste profile information regarding this wastewater but did not receive it. Since the waste profile was not provided and the wastewater is being manifested as D002, D004, D028, and D040 hazardous waste based on analyses, I noted its hazardous waste determination as a concern to verify representativeness. (AOC #2.a)

APPENDIX 6 – WASTE TABLE

#	WASTE NAME	GENERATION PROCESS	FACILITY'S HAZ. WASTE DETERMINATION	ESTIMATED GENERATION RATE & AMOUNT ACCUMULATED ON-SITE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
Hazardous Waste Tanks – I observed four above ground 6,500-gallon poly hazardous waste tanks (see Photos 1 and 2). Mr. Robbins stated that they are rentals. The following concerns were observed: - The four hazardous waste tanks are labeled “Waste Water” and not “Hazardous Waste” or with an indication of the hazards (see Photos 1 and 2). (AOC #2.c). - The amount of waste currently in the four hazardous waste tanks was unknown other than all, but Tank #2, were believed to be empty since they recently had a wastewater shipment and cleaned only one tanker since then. However, Mr. Robbins stated that the tanks contain sludge bottoms, but he did not know how much. He stated that the tanks have sight glasses to determine levels, however they are too cloudy to read (see Photo 2). Therefore, they must use the ladder to look inside the tanks to determine levels when needed. I asked Mr. Robbins if they conduct inspections on the tanks. He stated that they conduct inspections on the tanks but do not keep a log of the amount of hazardous waste in the tanks. I asked for copies of the tank inspection logs. Since no inspections were provided, I noted this as a concern (AOC #2.c). - The tanks were strapped down (see Photos 2, 38, 41, 97, and 99). I asked Mr. Robbins if the tanks had any controls on them and he stated no. I asked if they had any type of assessments or certifications conducted on the tanks when they were installed prior to use. Mr. Robbins stated that he would have to check to see if they had any type of assessment conducted. Since no tank assessments or certifications were provided, I noted this as a concern. (AOC #2.c). - The four hazardous waste tanks sit on a plastic liner that is used as secondary containment. Mr. Riffel stated that the liner was made of high-density polyethylene (HDPE). The containment walls are about a foot high, but parts of the wall had folded over/collapsed. The liner itself sits on a concrete area that appears uncoated/unsealed and the seams have cracks, spalling, and weeds growing in between (see Photos 16, 17, 38, 99, 100, 146, 149). (AOC #2.c). - The containment liner had residue and liquid puddles inside, and outside along the north side between the liner wall and the wash bays’ containment berm (see Photos 6, 11, 14, 16, and 17). Mr. Robbins stated that they last cleaned the liner about a month ago. (AOC #2.c). See waste stream #3 regarding the containment liner residue. - I asked Mr. Robbins how they account for potential incompatibles being added into the hazardous waste tanks. He stated that it is all just mostly water as the initial rinses are collected in drums with the heels and only the final rinses are accumulated into the hazardous waste tanks. He estimated the waste to be about 95% water and Mr. Riffel estimated it to be about 99% water. Also, Mr. Robbins stated that they wash down the pad with water after each tank cleaning. However, all types of tankers may be washed at any given time, and the wastewater contains some contaminants based on its color observed inside the containment and it was determined to be a D002, D004, D028, and D040 hazardous waste based on analyses. Therefore, there appears to be a potential for incompatibles mixing. Since there appears to be no routine sampling or process in place to account for preventing incompatibles mixing, I noted this as a concern (AOC #2.c). - It appeared that the hatches on all four hazardous waste tanks were open, i.e., the hatches were not screwed down (see Photos 97, 98, and 99). I asked Mr. Robbins if this was the case and he stated yes. He stated that this is because the tanks level gauges are too cloudy to see the levels. Therefore, they use a ladder to move from tank to tank to climb up on top of each tank and look inside the hatch to see how full it is. Mr. Riffel stated that he believes they addressed the RCRA CC air emissions requirements when they obtained their CAA permit by rule (PBR). He stated that they would not be subject to Subpart BB as the waste does not have enough organics. He stated that he would provide the documentation of when they obtained their CAA PBR. I did not receive this information. (AOC #2.c)						

APPENDIX 6 – WASTE TABLE

#	WASTE NAME	GENERATION PROCESS	FACILITY'S HAZ. WASTE DETERMINATION	ESTIMATED GENERATION RATE & AMOUNT ACCUMULATED ON-SITE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
During the inspection, they started cleaning out the containment liner on the south and east sides (see Photos 146 and 149). Mr. Robbins stated that he plans to have the tanks cleaned prior to returning them to the rental company. Mr. Robbins stated that they will be removing two tanks and placing a concrete containment around the remaining two tanks. Wash Bays Condition – On July 31, 2023, the two wash bays had not been used in about a week according to Mr. Robbins. I observed no one working in the area and some liquid on the wash bay concrete floor that Mr. Robbins stated was from recently washing down the pad (see Photos 2 and 3). He stated that the pad is power washed after each cleaning. The sump contained a small amount of liquid with a sheen (see Photo 3). Also, on August 1, 2023, I observed in the wash bay a tanker trailer (#SST708015) for cleaning, and no one working in the area. Liquid was puddled on the pad and the sump was full up to about 6 inches from the top and had a sheen near and inside (see Photo 85). Two drums of heels flush had been generated and dated 8/1/23 (see Photos 87 and 89). The wash bay concrete floor had some of the seams/cracks sealed as pointed out by Mr. Robbins. However, I observed liquid puddles and cracks in the floor that is used to convey the hazardous waste to the sump. See Photos 2, 3, 81, and 89. (AOC #2.e) The hazardous waste tank secondary containment liner sits on a concrete area that appears uncoated/unsealed and has cracks, spalling, and weeds growing in between the seams (see Photos 16, 17, 38, 99, 100, 146, and 149). Mr. Robbins stated that as the tankers are being cleaned, there is overspray from the top of the tankers onto the pad and tank containment liner. In addition, he stated that there are holes in the hoses that have been taped with duct tape (see Photos 11 - 13), but waste still sprays from these holes onto the pad and containment liner. Based on this, it appears that waste would be released from the wash bay pad onto the concrete area between the wash pad berm and the tank containment liner wall and also onto the west side of the pad (see Photos 3, 6, and 11). Therefore, I noted as a concern failing to operate to minimize a release. (AOC #2.d)						
3	Tank Containment Residue	Tank Wash Area - Mr. Robbins stated that the secondary containment for the 4 hazardous waste tanks is cleaned out about once per month.	Mr. Riffel and Mr. Robbins stated that all waste generated onsite is handled as hazardous waste. Waste profile documents were not provided. See discussion below.	About 15 gallons per month based on the amount observed in the liner at the time and it had not been cleaned out in about a month.	Mr. Robbins stated that the liquid is pumped back into one of the hazardous waste tanks and the solid residue is scooped up into a container.	CHDP has an employee that goes around once during each shift to collect the wastes from all the satellite accumulation areas to be incinerated. No shipping papers or logs are maintained.

APPENDIX 6 – WASTE TABLE

#	WASTE NAME	GENERATION PROCESS	FACILITY'S HAZ. WASTE DETERMINATION	ESTIMATED GENERATION RATE & AMOUNT ACCUMULATED ON-SITE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
Generation Process Discussion – As discussed above in waste stream #1, Wash Bay Condition, wastewater sprays out of the tankers and hoses and onto the hazardous waste tank containment liner. I observed inside the containment liner residue and liquid puddles. Also, I observed residue (with footprints) outside the north liner wall between the liner wall and the wash bays' berm (see Photos 6, 11, 14, 16, and 17). I asked how much residue was accumulated in the liner and Mr. Riffel estimated about 15 gallons. Mr. Robbins stated that they last cleaned the liner about a month ago. (AOC #2.c) Hazardous Waste Determination Discussion – Mr. Riffel stated that they treat all the waste generated onsite as hazardous waste. It was not clear what type of hazardous waste the containment residue was being managed as or if it was just declared hazardous waste. At the time, Mr. Robbins and Mr. Riffel were not clear what CHDP waste profile this waste would fall under as they did not believe it would be general trash. I asked for the waste profile for the containment residue but did not receive it. Therefore, I noted its hazardous waste determination as a concern. (AOC #2.a) Waste Determined to be Dirt – On August 1, 2023, I observed an open unlabeled hopper of two distinct colors of residue (about ½ to 2/3rds of a 55-gallon drum) on the northwest side of the wash bay (see Photos 105, 106 and 141). Mr. Robbins stated that it contained some of the dirt that was piled in the area to fill in potholes. However, it did not appear to look like the piles as they contained rocks and a different color as shown in the photos. Mr. Robbins stated that it had been there a long time. On August 2, 2023, Mr. Robbins stated that the waste in the screened hopper was dirt and sent to CHDP for incineration (see Photo 142).						
4	Spent Personal Protective Equipment (PPE)/Lab Sampling Waste	<u>Transfer Area</u> - Any PPE worn during the sampling process to include gloves. Also, includes any lab sampling related wastes according to Mr. Jackson. <u>Tank Wash Area</u> – Any PPE worn during the cleaning process to include gloves, tyveks, and booties according to Mr. Robbins.	Mr. Riffel and Mr. Robbins stated that it would be the same as the CHDP's PPE waste profile. Therefore, Mr. Riffel uploaded this profile during the inspection. It states the spent PPE is a hazardous waste including numerous RCRA codes.	<u>Transfer Area</u> - Mr. Jackson estimated about 1 drum/day, 7 days/week where a drum weighs about 25 pounds. <u>Tank Wash</u> - Mr. Robbins estimated about 1 drum/week total of which he estimated about 20 percent is PPE and 80 percent is trash.	<u>Transfer Area</u> - Collected in a 1-cubic yard box or a 55-gallon drum located in the sampling bay. <u>Tank Wash</u> - Collected in containers (e.g., 55-gallon drums, dumpster) with the general trash. When full, the trash is sorted out and the PPE is put in a bin (a 1-cubic yard cardboard box) with the above Transfer Area's spent PPE in the sampling bay according to Mr. Robbins.	CHDP has an employee that goes around once during each shift to collect the wastes from all the satellite accumulation areas to be incinerated. No shipping papers or logs are maintained.
Generation Rate – When CHESI registered with the state of Texas, they registered as a transfer facility under a Massachusetts EPA ID number and not an SQG. Based on Mr. Jackson's estimated generation rate, CHESI transfer would be a SQG subject to those applicable regulations including registering as a generator of hazardous waste. (AOC #1.c) Mr. Riffel stated that CHDP collects the satellite drum of spent PPE from the sampling bay each day and takes it to CHDP for incineration but does not keep any tracking information. He stated to get a better generation rate estimate, he will track this waste stream as he believes the estimate is too high since PPE is not that heavy. Satellite/Storage Containers – I observed the following seven containers of spent PPE/general trash:						

APPENDIX 6 – WASTE TABLE

#	WASTE NAME	GENERATION PROCESS	FACILITY'S HAZ. WASTE DETERMINATION	ESTIMATED GENERATION RATE & AMOUNT ACCUMULATED ON-SITE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
- Transfer Area – 1 closed, labeled 55-gallon satellite drum partially full of spent PPE/lab waste (see Photo 53). - Transfer Area - 2 opened 1-cubic yard boxes partially full of general trash mixed with PPE labeled “No Metals”. Mr. Jackson stated that they were non-hazardous waste and the spent PPE included was from the contractors working on the new tank wash facility (see Photos 50 and 55 - 57), - Transfer Area - 1 opened 1-cubic yard satellite box about 1/3rd full (i.e., less than 55 gallons) of spent PPE. It was labeled hazardous waste but not with an indication of hazards (see Photos 50, 52, and 53). (AOC #1.b) - Tank Wash Area - 1 opened unlabeled 55-gallon satellite drum approximately full inside the hazardous waste tank secondary containment liner (see Photos 3 and 9). (AOC #2.b) - Tank Wash Area – 1 opened 55-gallon satellite drum labeled “Trash” approximately half full located on the northwest corner of the wash bay (see Photos 79 and 80). (AOC #2.bi) - Tank Wash Area – 1 opened, unlabeled, and undated approximately 3-cubic yard Waste Management storage dumpster about half full of spent PPE and general trash. Mr. Robbins stated that the waste in this storage container is also sent to CHDP as a hazardous waste and not Waste Management. Since this waste is being managed as hazardous waste, I noted the opened, unlabeled, and undated storage container as a concern (see Photos 103 and 141). (AOC #2.b) On August 1, 2023, Mr. Robbins stated that they emptied all the Tank Wash general trash/PPE containers, and the spent PPE was added into the PPE box located in the sampling bays and the trash in containers. Mr. Riffel stated that the Transfer Area will stop using the 1-cubic yard boxes to accumulate this waste and only use drums (see Photo 132). This is because they do not want to have a less than 90-day storage area at this location since they cannot get a facility site ID number to register it.						
5	Spent Carbon	<u>Tank Wash Area</u> - The tankers being cleaned are vented to the carbon scrubber prior to flushing out the heels. The carbon scrubber is maintained by Hydro Chemical, Deer Park, Texas. They service the scrubber once a quarter and take the spent carbon with them as a co-generator.	Unknown as Hydro Chemical handles this waste as a co-generator.	Unknown as Hydro Chemical handles this waste as a co-generator.	Hydro Chemical removes the spent carbon at the time of service and handles this waste as a co-generator.	Hydro Chemical handles this waste as a co-generator and takes it for recycling.
Hazardous Waste Determination / Co-generator Discussion – Mr. Riffel and Mr. Robbins stated that Hydro Chemical is responsible for maintaining and servicing the carbon scrubber and takes any waste they generate with them. Based on this, Hydro Chemical appears to be a co-generator of the spent carbon. I asked for a copy of the spent carbon agreement with Hydro Chemical who is also owned by Clean Harbors according to Mr. Riffel and Mr. Robbins. Since I did not receive the agreement, I noted the spent carbon as a concern to verify that it is being managed as stated. (AOC #2.a)						

APPENDIX 6 – WASTE TABLE

#	WASTE NAME	GENERATION PROCESS	FACILITY'S HAZ. WASTE DETERMINATION	ESTIMATED GENERATION RATE & AMOUNT ACCUMULATED ON-SITE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
6	Caustic Scrubber Waste	<u>Tank Wash Area</u> - The tankers being cleaned are vented to the caustic scrubber prior to flushing out the heels.	Mr. Robbins stated that no waste has been generated to date.	Mr. Robbins stated that no waste has been generated to date.	Mr. Robbins stated that no waste has been generated to date.	Mr. Robbins stated that no waste has been generated to date.
7	General Trash	<u>Entire Site</u> - Paper, plastic, general refuse. Spent PPE is also collected with the general trash as discussed above (see waste stream #4).	Mr. Riffel and Mr. Robbins stated that all waste generated onsite is managed as HW. Waste profile documents were not provided. See discussion below.	Unknown as it is not tracked.	Collected in containers including 55-gallon drums and 1-cubic yard cardboard boxes (see waste stream #4). Mr. Robbins stated that CHESI Tank Wash has a Waste Management dumpster but they do not ship any waste to them as it is all sent to CHDP.	CHDP has an employee that goes around once during each shift to collect the wastes from all the satellite accumulation areas to be incinerated. No shipping papers or logs are maintained.

HW Determination Discussion – Mr. Riffel and Mr. Robbins stated that they treat all the waste generated onsite as HW just like at CHDP. It was not clear what type of HW this general trash was being managed as or if it was just declared HW. Mr. Riffel stated that they have a waste profile for the general trash. Therefore, I asked for the waste profile for the general trash but did not receive it. Therefore, I noted its HW determination as a concern. **(AOC #2.a)**

APPENDIX 6A

Partial Inventory for the Drums of Heels Flushes

Summary will be placed in 5/1/23
Drum full date placed in 5/1/23
of original manifest in on

Date	MANIFEST	TRAILER #
5/20/2023	016323767FLE	4446
6/2/2023	017710841FLE	T23018
6/28/2023	017903113FLE	5166
6/29/2023	017903110FLE	5092
6/30/2023	017903112FLE	5107
6/30/2023	017903115FLE	5110
7/7/2023	017903117FLE	5094
7/11/2023	016902059FLE	SST-70-1003
7/11/2023	017903118FLE	TT784
7/11/2023	024294745JJJ	T-15155
7/12/2023	015449897FLE	T692H
7/13/2023	018740693FLE	T-531
7/17/2023	024268584JJJ	917
7/17/2023	017332355FLE	5018
7/18/2023	017332354FLE	5087
7/19/2023	017332352FLE	5023
7/19/2023	018748877FLE	1831
7/19/2023	017332353FLE	5166
7/20/2023	024268587JJJ	50165
7/20/2023	017903316FLE	SST-70-2016
7/20/2023	017332350FLE	5024
7/21/2023	017332377FLE	5069
7/21/2023	017903308FLE	4445
7/24/2023	017332376FLE	5110
7/24/2023	024268602JJJ	50142
7/27/2023	024268621JJJ	777
7/28/2023	018835430FLE	800204V
7/28/2023	018835439FLE	800473V
7/28/2023	024268634JJJ	4082
7/28/2023	017332375FLE	5103
7/31/2023	024455866JJJ	4381
7/31/2023	017903309FLE	9736
8/1/2023	015910547FLE	SST-70-8015

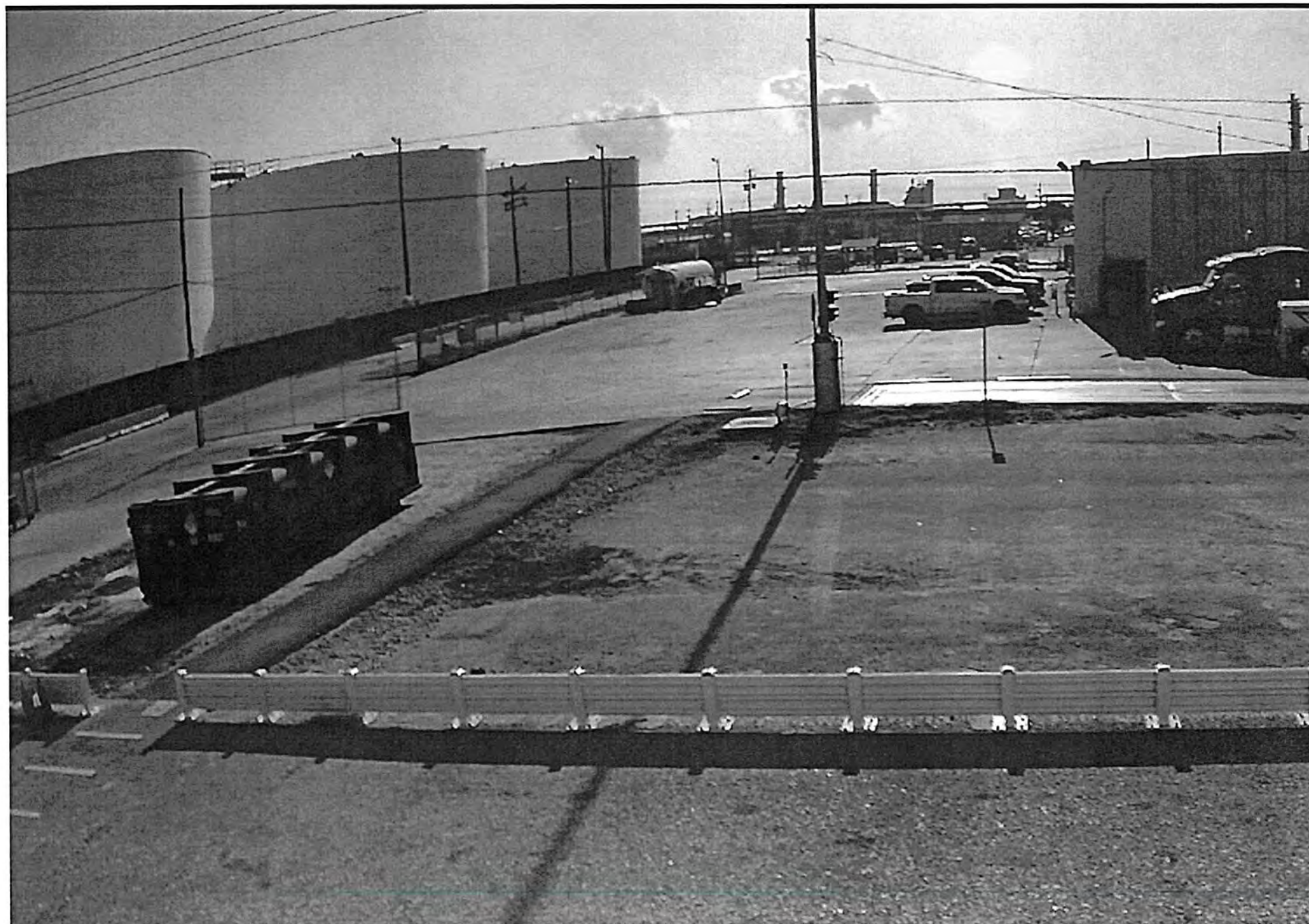
Qty Generated
internal batch #
Gen of the Branch
(some times fed by it with sign flow own)

Drums	DR#	Customer	Branch Owners
8	DR-583	Equistar	JOBE
8	DR-603	FORMOSA	JOBE
20	DR-627	FORMOSA	JOBE
1	DR-631	FORMOSA	JOBE
4	DR-632	FORMOSA	JOBE
2	DR-633	FORMOSA	JOBE
4	DR-643	FORMOSA	JOBE
8	DR-648	Equistar	MCGEE
8	DR-651	FORMOSA	JOBE
8	DR-652	Union Carbide	BROWN
6	DR-654	Equistar	JORDAN
9	DR-655	Equistar	JORDAN
12	DR-657	Seadrift Union Carbide	JOBE
6	DR-658	FORMOSA	JOBE
4	DR-660	FORMOSA	JOBE
4	DR-661	FORMOSA	JOBE
2	DR-662	centauri	MCGEE
8	DR-663	FORMOSA	JOBE
10	DR-664	Seadrift Union Carbide	JOBE
6	DR-665	FORMOSA	PRICE
6	DR-666	FORMOSA	JOBE
4	DR-668	FORMOSA	JOBE
8	DR-669	Equistar	JOBE
4	DR-670	FORMOSA	JOBE
4	DR-671	Seadrift Union Carbide	JOBE
4	DR-674	Seadrift Union Carbide	JOBE
4	DR-675	FORMOSA	AMOS
4	DR-676	FORMOSA	AMOS
2	DR-677	Seadrift Union Carbide	JOBE
4	DR-678	FORMOSA	JOBE
6	DR-679	CHEMOURS	LESLIE
8	DR-680	Equistar	JOBE
2	DR-681	Westlake	BROWN

APPENDIX 7

Security Camera Photo Angles











APPENDIX 8

List of Requested Documents

Review Daily Summaries for comment

Tank Wash

Training Docs

Sub Descrip/completed training for employees named

Inspections

containers/tanks/emerg equip/security/etc.

SOPs for waste management

Tanks - initial tank assessments

- ACR4 CC evaluation

-

Waste Profiles/Determinations for all waste streams

SDS of Diesel + Metaphos cleaner, caustic, detergent

Hydro Chemical - spent carbon agreement/ship document

Container Inventory at time of insp 7/31/23

Wash Tickets ^{names} for 1mo + the latest 10 rejected non-empty Containers and manifests

Transporter - who owns this site

Training Docs for 2 employees

Inspections

SOPs for waste management

Manifests

- Import Example

-

WINWEB - hub stops shown

- mnt 01793329 FLE, 008304425 SKS, 0184544 FLE

Waste Profiles for PPE / Lab Waste (Handled as one or separate if handleless such)

CHDP Info for Container #4 - VBI2007, CHVB0654, RT-25145, CHVB0230
+ mnt #018148736 FLE

CHDP Permit Info for BIN Stg area

APPENDIX 9

Signed CBI Notices

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
PROPRIETARY/CONFIDENTIAL BUSINESS INFORMATION NOTICE**

Facility: Tank wash	
Facility Address: 2027 Independence, Deer Park, TX	
Facility Representative with authority to make a CBI claim (print name & title):	Date: 8/2/2023
	Signature (Optional): 
	Phone/email: Robbins, Michael @ 713-446-3870 cleanharbors.com

EPA Inspector (print): Address: [mailing or courier address appropriate for inspector and/or inspector's Document Control Officer]	Date:
	Phone:
	Email:

[illegible]

Additional CBI Claims: You or the inspector may use this box to list and generally describe any CBI claims.



Part B of this Notice explained how to identify information claimed as CBI. You or the inspector may use this box to list and generally describe any CBI claims.

Example: Internal layout of facility.

NO CBI'S AT THIS TIME

Additional CBI Claims: You or the inspector may use this box to list and generally describe any CBI claims.