

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	4/19/2023	
Media Program:	Resource Conservation and Recovery Act (RCRA)	
Regulatory Program(s)	RCRA Treatment Storage and Disposal Facility (TSDF) and Large Quantity Generator (LQG) of hazardous waste	
Company Name:	Clean Harbors Deer Park, LLC	
Facility Name:	Clean Harbors Deer Park	
Facility Physical Location:	2027 Independence Pkwy S	
(city, state, zip code)	Deer Park, TX 77536	
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 riffel.bruce@cleanharbors.com	Sr. Environmental Compliance Manager
FRS Number:	110000463365	
Identification/Permit Number:	Texas Solid Waste Registration #50089	
Media Identifier Number:	TXD055141378	
NAICS:	562998 ALL OTHER MISCELLANEOUS WASTE MANAGEMENT SERVICES	
SIC:	--	
Personnel participating in inspection:		
Dedriel Gardner	EPA R6/ECD-SR	Lead Inspector, Environmental Engineer
Nicole Weist	TCEQ	Environmental Investigator
Casmir Emeka Onwuka	TCEQ	Environmental Investigator
Elizabeth Greebone	TCEQ	Environmental Investigator
Daniel Tauriello	Clean Harbors Deer Park	General Manager
Steven Banister	Clean Harbors Deer Park	Incinerator Manager II
Cedric Andrews	Clean Harbors Deer Park	Lab Supervisor
Randolph Jackson	Clean Harbors Deer Park	Lab Manager
Herman Lewis	Clean Harbors Deer Park	Residual Development Supervisor
Bruce Riffel (by phone only)	Clean Harbors Deer Park	Sr. Environmental Compliance Manager
EPA Lead Inspector Signature/Date		
	Dedriel Gardner	Date
Supervisor Signature/Date		
	Jeff Yurk	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On April 19, 2023, I, Dedriel Gardner, conducted an unannounced inspection of the Clean Harbors Deer Park facility (CHDP) located at 2027 Independence Pkwy S in Deer Park, Texas. The inspection focused on compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted by Texas Commission on Environmental Quality (TCEQ) investigators Nicole Weist, Casmir Emeka Onwuka, and Elizabeth Greebone. The inspection included a walkthrough of the facility's adjacent transfer storage area, waste receiving, testing, and treatment processes as well as a review of facility records related to hazardous waste management.

The facility was targeted for inspection due to its recent acceptance for treatment/disposal of contaminated soil originating from the East Palestine, Ohio train derailment cleanup in February 2023, when Norfolk Southern tanker cars containing vinyl chloride spilled and were subsequently burned. The cleanup process has attracted national media attention. CHDP has received two shipments of hazardous contaminated soil from the spill site on April 15 and 16, 2023. The facility representatives did not know how long they would be receiving shipments from the site.

This report serves as documentation of all onsite activities and observations during the inspection of the CHDP facility. Photographs taken during the inspection to document onsite observations are included as Appendix 1. Also, I set up an electronic secure online drive for documents to be uploaded during and after the inspection. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

CHDP is a permitted waste treatment, storage, and disposal facility that specializes in incineration of hazardous wastes. The facility has been in operation since the early 1970s. The facility operates three kilns on two incinerator trains. Train I has one kiln that is permitted by Toxic Substance and Control Act (TSCA) and RCRA, and Train II has two kilns permitted by RCRA. More detailed information has been prepared by CHDP in a Facility Audit Package (Appendix 2). 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. CHDP operates 24/7, employs approximately 308 people onsite, and occupies approximately 145 acres. It is surrounded by industrial businesses and a facility map was provided (Appendix 3).

Section II - OBSERVATIONS

Ms. Weist, Mr. Onwuka, Ms. Greebone, and I, entered the facility at 11:16 A.M., signed in and watched a safety video while waiting for facility representatives. We soon met Daniel Tauruello (General Manager) and Steven Banister (Incinerator Manager II) who acted as the facility representatives. However, Mr. Tauriello explained that their Compliance Manager, Bruce Riffel, was not available. Therefore, Messrs. Tauruello and Banister stated that Mr. Riffel would have to answer any questions they could not. I

provided them an initial list of compliance records for my review (see Appendix 4). Mr. Tauriello stated that Mr. Riffel would have to provide the requested records when he returned.

We presented our credentials to Mr. Tauriello and informed him that we were there to conduct a focused inspection of the facility under the authority of Section 3007 of the RCRA. I explained the right of CHDP to assert a Confidential Business Information claim for records requested by the EPA and presented a copy of EPA Region 6's Confidentiality Notice (40 C.F.R. §2.203). I then facilitated an opening briefing with Messrs. Tauriello and Banister, where we discussed the purpose of EPA's inspection: assessment of CHDP's compliance with its requirements under RCRA as they pertain to East Palestine, Ohio waste. Also, I discussed the process for transferring electronic records to the EPA electronic secure online drive set up with access limited to the inspection participants.

We conducted the onsite inspection during business hours on April 19, 2023. During the inspection, Train II was down for necessary repairs and since January 13, 2023, the three onsite landfills were no longer receiving ash as two were full and the other close to full. We visited the 10-day transfer area, laboratory, bin storage area (BSA), incinerator dry feed pit, control room, and ash management areas. Also, we reviewed records pertaining to the facility's RCRA applicability and compliance requirements, specifically regarding the management of hazardous waste received from East Palestine, Ohio.

This section provides an abbreviated description of our onsite activities (see Appendix 4 for a daily summary). Appendix 1 provides photographs of these observations. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection.

East Palestine Waste Received – As of the inspection, CHDP has received two roll-off shipments of vinyl chloride-contaminated soil, EPA listed waste code U043, from the cleanup of the February 3, 2023, Norfolk Southern train derailment in East Palestine, Ohio. The soil is to be incinerated. The roll-offs remain in a 10-day transfer storage area and have not been accepted (i.e., manifest not signed), although they have been sampled and analyzed for acceptance as discussed below. Messrs. Tauriello and Banister stated that CHDP plans to accept the two shipments and process them through Train II. However, Train II was shut down for repairs as of April 13, 2023. Mr. Tauriello stated that they expect Train II to be running by the end of next week (April 28, 2023) and expect to start processing the East Palestine waste. Mr. Tauriello stated he believed about two roll-offs per day was scheduled to be sent to CHDP but would verify. I asked for this information to be provided as a follow up item.

The two manifested shipments sent to CHDP as of April 19, 2023, include:

Date Received	Container #	Est. Received	Date Sampled by CHDP
4/15/23	#25536	17 tons	4/18/23
4/16/23	#25249	19 tons	4/17/23

East Palestine Waste Expected Treatment/Disposal Path – Mr. Tauriello and Banister explained treatment/disposal path the East Palestine waste will follow: receive waste at the 10-day transfer storage area; sample for acceptance; sign manifest and transfer to the BSA for storage; determine how to burn - as is or mixed with other wastes; then dump into the incinerator dry feed pit where it is sent through a shredder and screw conveyed into the kiln. The East Palestine waste is expected to contain less than 5,000 BTUs and low metals content and therefore be burned as is in Train II. The resultant incinerator ash and emissions filter cake will be collected into roll-offs and taken to the 24-hour ash storage area for cooling and then ash/filter cake storage area. Once the land disposal restriction (LDR) criteria are met, the ash and filter cake will be loaded into railcars and manifested to Clean Harbors Lone Mountain (CHLM), Oklahoma, to be landfilled.

Facility Walkthrough – EPA and TCEQ inspectors, along with CHDP facility personnel Messrs. Tauriello and Banister, started out to visually inspect the facility where the East Palestine waste are currently stored and the processing from onsite acceptance to incinerator ash off-site shipment. Mr. Tauriello accompanied us only to the 10-day transfer storage area and Mr. Banister accompanied us throughout the walkthrough. We met other employees in their respective areas as noted on the cover page of this report.

I observed the following in the areas visually inspected:

- 10-day Transfer Storage Area
 - Many roll-offs of hazardous wastes being stored including the two shipped from East Palestine (see Photos 1 thru 11). I was provided a copy of the manifests for these two roll-offs of U043 hazardous waste (see Appendix 5).
 - The transfer storage area consists of a concrete pad that appeared in poor condition based on the cracked concrete (see Photo 11). Mr. Barrister stated that this was probably due to heavy trucks rolling over the 4-inch-thick concrete.
 - Each roll-off receives a container tracking ticket (CTT) when CHDP decides to accept it and a sample tracking sheet. See Photos 1, 3, 8, and 9 for the CTTs and sample tracking sheets on the two East Palestine waste roll-offs.
 - The 10-day transfer area appears to be contiguous to the CHDP.
- Laboratory
 - Environmental “old lab” where waste samples are analyzed for metals content.
 - Receiving lab where fingerprint analyses are conducted on waste samples which includes density, pH, BTUs, etc.
 - Cedric Andrews (Lab Supervisor) provided sampling documents for the two East Palestine shipments including a chain-of-custody, analytical results, and waste profile information (see Appendix 6).
 - Lab storage trailer (secured with a lock and key) where retained samples of waste are stored for 30 days and where a satellite accumulation area for the lab’s liquid hazardous wastes is located. I observed the retained waste samples from the two East Palestine manifest shipments (see Photos 12 and 13).

- 30-day storage area where the lab's solid hazardous and PCB wastes are stored in 55-gallon drums. This includes the solid retained waste samples after 30 days in the lab storage trailer (see Photo 20). When full, the drums of hazardous waste are treated in the onsite incinerator. I observed stored eight 55-gallon drums labeled Hazardous Waste, Ignitable, PCB Lab Waste - Lab Generated, of which four were empty and four partially full (see Photo14). No one was working in the area. The drums contained more than one white CHDP label (the label with bar codes used for tracking) each with different container numbers and dates (see Photos 15 thru 19). For example, I observed a drum with two white CHDP labels, one stating that it was container #A0082TV1 dated 3/8/23 and the other stating it was #A0082TV4 dated 3/4/23 (see Photo 15). Also, I observed another drum with two white CHDP labels, one stating that it was container #A006MYW5 dated 12/4/22 (i.e., greater than 90 days) and the other stating it was #A0082TUX dated 3/__/23 (could not read day) (see Photos 16 and 17). Randolph Jackson (Lab Manager) stated that they are supposed to remove the old labels when a new label is added. In addition, the drums contain yellow hazardous waste labels, however, they are incomplete (no date) and/or torn. According to 262.34(a)(2), the date must be clearly marked and visible for inspection on each container. **(Area of Concern (AOC) #3)** The drums in this area were re-labeled and dated during the inspection (see Photos 74 thru 77). However, they still had two dates as discussed below in Section IV.
- BSA
 - I observed many roll-offs of hazardous waste being stored. I observed that the containment base appears uncoated/unsealed and has cracks in and spalling around the seams (see Photos 21 thru 25). Mr. Banister stated that only solids are stored in the area. I asked for information regarding what the permit requires for the secondary containment in this permitted storage area, i.e., does it have to be maintained in good condition.
- Train II Incinerator
 - The unit was shut down for repair and had restricted access for safety reasons. Therefore, the visual inspection consisted mostly of a drive-by.
- Incinerator Dry Feed Pit (aka Rotary Reactor Feed Tower)
 - This is where the waste is dropped into the pit for incineration. I observed the door to the unit open and no one working in the area. Residue had accumulated inside and just outside the unit (see Photos 26 thru 29). If the residue were to be cleaned up, Mr. Banister estimated it would be about one quart outside and five gallons inside. He stated that the unit had not been used between the previous and current shut down periods. Mr. Banister stated that Train II was previously shut down and brought back online on March 27, 2023, but before operations could restart, it had to be shut down again on April 13, 2023, due to the electrostatic static precipitator (ESP) needing repair. During the previous shutdown, the tower inside walls were blasted and generated residue (believed mostly rust) that dropped and accumulated onto the floor according to Mr. Banister. He stated that normally the door on this unit remains closed until waste is dropped into it and then it is reclosed. According to 30 TAC 335.504, a hazardous waste determination must be made on each solid waste at the point of waste generation. Mr. Banister did not know if a hazardous waste determination had been made on this waste and stated that Mr. Riffel would have to answer this question. **(AOC #4a)**

- Control Room
 - This is where Train I and Train II are monitored and controlled. I observed Train I operating and Train II shut down.
- Train I Ash Collection Roll-off
 - Ash was actively being collected after being dipped in a tank of water. This area was shown as an example of how the ash is also collected on Train II.
- 24-Hours Ash Holding Area
 - Open roll-offs of ash cooling prior to being taken to the ash/filter cake storage area (Photo 30).
- Ash/Filter Cake Storage Area
 - I observed many roll-offs of ash, filter cake, and debris being stored and no one working in the area (see Photos 31 thru 33, 70 and 71). The debris was generated from removing concrete to put in a new fire water pipeline. Herman Lewis (Residual Development Supervisor) provided an inventory of this storage area and the batch processing log showing which roll-offs were scheduled to be processed that day (April 19, 2023) (see Appendix 7). I observed some of the roll-offs open, partially dated (no year), in poor condition due to rusted holes, and/or had waste releases. Appendix 8 provides a description of nine roll-offs and the conditions observed. **(AOCs #1, #2, #3 and #4c)**
 - Inside the containment area I observed ash releases on the bottom of roll-offs, on the concrete containment base, and stormwater drains (see Photos 69 thru 71). The drain was labeled “Dump No Waste! Drains to Waterways”. In addition, I observed outside the containment area miscellaneous items scattered including empty yellow drums that were used when working with groundwater monitoring wells, pieces of a landfill liner, one absorbent square pad, and a tarp such as those used to cover the roll-offs (see Photos 44 thru 46). Mr. Banister was on the phone with Mr. Riffel for a short time while we were visually inspecting this area. Mr. Riffel stated that the drain is a stormwater drain and it discharges to an outfall (he believes #3) located to the west of the storage area. Mr. Banister believed the ash and filter cake were handled as non-hazardous waste. However, Mr. Riffel clarified that the ash was listed hazardous waste. It appears that the stormwater would be an environmental media subject to the contained in policy and a hazardous waste determination must be made on each solid waste as required by 30 TAC 335.504. **(AOC #4b)** Also, according to 40 CFR 262.34 (a)(4) ref 265.31, a LQG must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. Therefore, I noted as a concern the facility not being operated to minimize the possibility of a release of hazardous waste ash and/or filter cake to the waterways. **(AOC #5)**
 - Mr. Lewis stated that their excavator was down which is why the waste roll-offs were still open in the storage area. He stated that it had been down for about an hour. Mr. Lewis stated that they are allowed to open the roll-offs on the day they are scheduled to be processed (see Appendix 7 for the roll-offs scheduled to be processed on April 19, 2023). I asked for documentation stating they are allowed to open the roll-offs on the day they are processed.

- Residual Gondola Building
 - This is where ash/filter cake/lime mixtures are added into railcar flatbed gondolas for off-site shipment. The building was added in January 2023 and does not have any doors as CHDP is waiting for them to be delivered (see Photos 72 and 73).

Section III – AREAS OF CONCERN

Ms. Weist, Mr. Onwuka, Ms. Greebone, and I, conducted a closing conference with Messrs. Tauriello and Banister on April 19, 2023. During the closing conference, I reviewed the outstanding document requests and the following provisional areas of concern noted during the inspection.

- **AOC #1** – According to 40 CFR 262.34(a)(1)(i) ref. 265.171, if a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of this part. I observed 4 roll-offs of hazardous waste ash and filter cake in the ash/filter cake storage area in poor condition.
- **AOC #2** – According to 40 CFR 262.34(a)(1)(i) ref. 265.173, a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. I observed 7 roll-offs of hazardous waste ash and filter cake in the ash/filter cake storage area that were not closed.
- **AOC #3** - According to 262.34(a)(2), the date must be clearly marked and visible for inspection on each container. I observed 4 partially full drums of hazardous waste, ignitable, PCB lab waste in the 30-day lab storage area with multiple dates.
- **AOC #4** – According to 30 TAC 335.504, a hazardous waste determination must be made on each solid waste at the point of waste generation.
 - I observed waste released from the incinerator dry feed pit. Mr. Banister did not know if a hazardous waste determination had been made on this waste and stated that Mr. Riffel would have to answer this question. Therefore, I noted it as a concern. **(AOC #4a)**
 - I observed hazardous waste ash and filter cake releases in the ash/filter cake storage area where stormwater drains are located. The stormwater as an environmental media would be subject to the contained in policy and a hazardous waste determination would be required. Therefore, I noted it as a concern. **(AOC #4b)**
 - I observed 2 roll-offs of remediation dirt/concrete from fire water line leak repair in the <90-day ash/filter cake storage area. Mr. Banister believed it was non-hazardous waste. However, one of the roll-offs had a faded yellow hazardous waste label and the other did not. Therefore, as verification I asked for the waste determination documents for this waste and noted it as a concern **(AOC #4c)**.
- **AOC #5** - According to 40 CFR 262.34 (a)(4) ref. 265.31, a LQG must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. I noted as a concern the ash/filter cake storage area not being operated to minimize the possibility of hazardous waste ash and/or filter cake being released to the waterways.

Section IV – FOLLOW UP

On April 21, 2023, I had a conference call with Bruce Riffel (CHDP, Sr. Environmental Compliance Manager) as a follow up to the inspection. He provided the following additional information.

1. **Initial List of Documents EPA Requested** (see Appendix 4) – Mr. Riffel stated the following:
 - a. He will start Monday (April 24, 2023) uploading the documents in response to this initial request.
 - b. The East Palestine waste could possibly be burned on Train I, not just Train II, so he will also send some Train I information.
 - c. He did not know the schedule of waste loads expected from East Palestine but stated that he will see if CHDP has something like this to provide EPA.
 - d. Any East Palestine waste sent off site will consist of the derived from incinerator ash and filter cake. It will be sent to CHLM which is a sister company. Therefore, CHDP will send CHLM a waste profile, and then CHDP will get an approval email from CHLM to send the ash/filter cake. Consequently, EPA's request for agreements and/or contracts between CHDP and designated facilities for any outgoing wastes, Mr. Riffel will send the approval email.
2. **Audit Package** – The audit package provided to me during the inspection was written in 2008 and updated in 2015. It is still current because Mr. Tauriello printed out an updated closure cost estimate, financial assurance, insurance information, and current permit cover sheets. Also, since the plan's Attachment 4 was difficult to read, Mr. Riffel will resubmit it as part of the diagrams in their permit that was also requested.
3. **CBI** - Mr. Riffel will have Mr. Tauriello or Mr. Banister sign the CBI form as Mr. Riffel was not present during the inspection and then Mr. Riffel will upload it to the electronic secure drive. Mr. Riffel sees no CBI other than the security plan which I informed Mr. Riffel that I only need the non-CBI version that is in their permit at this time.
4. **BSAs** – I asked Mr. Riffel what the permit requirements for the BSAs are, i.e., do they have to be maintained in good condition. He stated that he would send the permit and engineering report for the BSAs. He stated that only solids are stored in this area and any incoming roll-off waste that fails the paint filter test is rejected back to the customer. However, if needed CHDP has a permitted storage area for liquids.
5. **Noted 10-Day Transfer Area** – I asked Mr. Riffel if the 10-day transfer area is contiguous to CHDP and how does CHDP consider the wastes to still be in transit.
 - a. Mr. Riffel stated that CHDP's supply warehouse is located between the two sites. He stated that the warehouse is not a part of CHDP's RCRA permitted area which is why it is not inside that part of their security fence. He stated that the transfer facility is a Clean Harbors Environmental Services facility that has its own EPA ID number (EPA ID# MAD039322250). Mr. Riffel stated that also the railroad tracks which must be crossed are not owned by CHDP.
 - b. Mr. Riffel stated that CHDP still considers the waste in transit as CHDP has not accepted the waste by signing the manifest. He stated that once the manifest is signed, CHDP will bring the waste on-site. Mr. Riffel stated that a CHDP driver will collect the waste, drive it down the road that is not a public road, but a road maintained by CHDP and Intercontinental Terminal Company (ICT), and across the railroad tracks into the CHDP permitted facility (see Appendix 3 for facility map). He stated that CHDP has been using this transfer site as such since the facility was built.

- c. I informed Mr. Riffel of the EPA RO11365 letter that states: *“A transporter who ships to a piece of property contiguous to a recycling facility has technically completed the transportation phase if no further “transportation” (as defined in Section 260.10-- movement by air, rail, highway, or water) is to be conducted. Thus, a piece of property contiguous to a recycling facility must meet the definition of a designated facility.”* I let him know that EPA would be following up on this issue to verify that it is allowable. I also let Mr. Riffel know that if he wanted to provide any additional information on it that he could.
 - d. I asked Mr. Riffel when is a CTT applied to the container (see Photos 7 and 9 as an example). Mr. Riffel stated that he does not know what ticket I am referring to and would have to look at the photos and let me know. I told him to look for photos of the East Palestine roll-offs #25536 and #25249 and it is the yellow sheet.
 - e. I asked Mr. Riffel what the white sheet label is that states to leave on the bin that was also put on the East Palestine roll-offs while in the transfer area (see Photos 7 and 8 as an example). He stated that it is for internal tracking purposes only.
6. **Ash/Filter Cake Storage Area** – I asked Mr. Riffel about the management of the ash/filter cake storage area, and he stated the following:
- a. CHDP refers to this area as the S&E Storage Area and other names but my referring to it as the ash/filter cake storage area is okay as they will know where I am talking about.
 - b. The area is not a permitted unit and is managed as a less than 90-day storage area. It should be noted that based on this, any roll-offs stored over 90 days in this area would be stored in an unpermitted area.
 - c. I asked Mr. Riffel to provide the documentation stating that CHDP is allowed to keep the containers of ash and filter cake open on the day they are scheduled to be processed. However, Mr. Riffel was not readily aware of this being allowed and stated that he had asked the related ash operators for their SOP regarding it. I asked him for a copy of this SOP.
 - d. I asked Mr. Riffel why this apparent secondary containment area has stormwater drains that discharge to an outfall as opposed to being contained, and if CHDP has a discharge permit for it. He stated because the storage area was located so close to the edge of the north landfill (see Appendix 2 for facility plot plan), they constructed the containment to serve as a retaining wall for the landfill cover more so than it being constructed as containment for a storage area.
 - e. During the inspection, I observed remediation dirt/concrete waste in the storage area and asked Mr. Riffel for the waste profile for this waste. I specifically asked for one of the containers I observed that was labeled Tracking #A0082WFP – DEA10-036. Mr. Riffel state that he will send EPA the waste profile.
 - f. I asked Mr. Riffel for a facility layout showing the ash/filter cake storage area and gondola railcar loading building as they did not show on the one provided. Mr. Riffel stated that he would provide a copy.
 - g. Mr. Riffel provided the following information regarding the ash/filter cake storage area inventory and batch processing sheet I was given during the inspection (Appendix 7):
 - i. Ash is re-burned if it does not pass organics for LDR purposes and stabilized if it does not pass metals. I observed roll-offs of ash labeled as re-burn during the onsite inspection and roll-offs noted for re-burning on the inventory provided. I asked Mr. Riffel if these containers still needed to meet RCRA Level CC requirements even though they have been through the furnace. He did not believe so as the LDR limits are low in the part per million (ppm), whereas the

- CC applicable levels are higher. However, he will verify and let me know for the two containers that I observed open and labeled as re-burn (containers #DEA12-006 and DEA12-024). Also, I asked Mr. Riffel what compliance CHDP is meeting to comply with RCRA air emissions Subpart AA/BB/CC, especially regarding CC and the roll-offs that do not pass organics. Mr. Riffel stated that he would send the air emissions part of their permit.
- ii. The status “23112” on the inventory provided is the batch number the bins will be processed into.
 - iii. The “date out” on the inventory provided is the date the roll-off was placed in storage.
 - iv. The unit number on the inventory provided is the furnace number.
7. **24-hr Ash Staging Area** – During the inspection, I observed open containers of ash in this area. Mr. Riffel stated that the 24-hr ash staging area is for cooling because if they put the tarp on too early it will melt.
8. **Lab’s 30-day Storage Area for Solids**
- a. Mr. Riffel stated that this area is managed as a less than 90-day storage area.
 - b. I asked Mr. Riffel to provide the waste profile for the lab solid waste accumulated in this area. He stated that it gets burned in the 3.6 furnace on Train I.
 - c. Regarding the containers re-labeled during the inspection, I asked Mr. Riffel what the two unidentified dates on the corrected labels are (i.e., the 4/4/23 typed on top and 4/18/23 handwritten). He stated that the 4/4/23 is the date the label was printed, and they probably just printed a lot of labels on that date to be used. Therefore, the handwritten date is probably the accumulation start date, but he will go look at the labels, ask them at the lab, and let me know. **(AOC #3)**
9. **Emergency Coordinators (ECs)** - I asked Mr. Riffel who are their ECs and he stated Mr. Tauriello, Mr. Banister, and “Mark”. Mr. Riffel will upload the contingency plan for me to verify.
10. **Regarding sending weekly information on the amount of East Palestine waste received** – EPA will be in weekly communication with CHDP to track the receipt and disposal of hazardous waste soil from East Palestine, Ohio. Mr. Riffel stated that he will run a weekly report every Friday to let EPA know what they receive of the East Palestine waste. I will look at what he initially sends and then let him know if it is what EPA needs weekly. The facility representatives did not know how long these efforts will continue with East Palestine.

The following information was uploaded to the secure online drive by CHDP after exiting the facility:

- Ash lab results
- Emergency plans (contingency and security plans)
- Facility inspection records
- Facility Maps and Diagrams
- Operating Records
- Outbound manifests
- Permits and forms
- Training records
- Waste analysis plan (WAP)
- Weekly lab results and waste received spread sheet

Also, Ms. Weist took the photographs during the inspection and uploaded them to the electronic secure online drive after the inspection.

Section V – LIST OF APPENDICES

- Appendix 1 - Photo Log
- Appendix 2 - Facility Audit Package
- Appendix 3 - Annotated Facility Map
- Appendix 4 - Daily Summary with Attachments
- Appendix 5 - Two East Palestine Waste Manifests
- Appendix 6 - Two East Palestine Waste Shipments Sampling Related Documents
- Appendix 7 - Ash/Filter Cake Storage Area Inventory Log and 4/19/23 Batch Processing Sheet
- Appendix 8 - Ash/Filter Cake Storage Area 4/19/23 Onsite RCRA Inspection Container
Observations and Related AOCs