

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	August 22, 2023	
Media Program:	RCRA	
Regulatory Program(s)	Hazardous Waste Generator	
Company Name:	Centurion Container, LLC.	
Facility Name:	Houston Facility	
Facility Physical Location:	8203 Market Street	
(city, state, zip code)	Houston, Texas 77029	
Mailing address:	8203 Market Street	
(city, state, zip code)	Houston, Texas 77029	
County/Parish:	Harris County	
Facility Phone Number	(713)444-9365	
Facility Contact:	Luis Cantu	SHEQ Manager
	Luis.cantu@centurioncontainer.com	
FRS Number:	110000461385	
Identification/Permit Number:		
Media Identifier Number:	RCRA: TXD008071029	
NAICS:		
SIC:	5093 – Scrap and Waste Materials	
Personnel participating in inspection:		
John Penland	USEPA Region VI	Senior Environmental Scientist
Sandesh Thapa	USEPA Region VI	Environmental Scientist
Luis Cantu	Centurion Container, LLC.	SHEQ Manager
Darwin Guzman	Centurion Container, LLC.	Plant Manager
EPA Lead Inspector Signature/Date	JOHN PENLAND John Penland	Digitally signed by JOHN PENLAND Date: 2023.11.02 22:44:25 -05'00' Date
Supervisor Signature/Date	DEBRA PANDAK Debra Pandak	Digitally signed by DEBRA PANDAK Date: 2023.11.06 15:47:44 -06'00' Date

Section I – INTRODUCTION

On August 22, 2023, I, John Penland, conducted an unannounced inspection of the Centurion Container, LLC. (Centurion) facility located at 8203 Market Street in Houston, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector Sandesh Thapa. The inspection included walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

The Centurion facility was targeted for inspection as part of the Region 6 response to EPA's November 2022 Drum Reconditioner Damage Case Report.

FACILITY DESCRIPTION

The Centurion Container, LLC. facility in Houston, Texas is a reconditioning and remanufacturing facility for used intermediate bulk container (IBC) totes. Centurion currently notifies as a Small Quantity Generator and was issued the EPA ID number: TXD008071029. The facility has never submitted a biennial hazardous waste report.

Wastes generated by the facility include: wastewater; contaminated personal protective equipment; chemical residues from containers; and sawdust used to absorb spills and small amounts of container residue.

Centurion operation areas at this facility include: container receiving; IBC emptying and processing; container wash line; outdoor IBC storage; and the waste storage.

Section II – INSPECTION SUMMARY

August 22, 2023

We arrived at the Centurion facility at approximately 10:00am Central Time and began the inspection with an opening conference. During this conference, we presented our credentials to Mr. Luis Cantu and informed him that we were there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. During this conference, we also discussed the purpose and scope of the inspection and notified them of the facility's right to assert a claim for Confidential Business Information for records collected during this inspection.

Following the opening conference, we had a tabletop discussion of the facility's process followed by a walkthrough of the facility's process and storage areas to identify activities that could generate hazardous waste and evaluate its subsequent management.

IBCs are reconditioned by disassembling and removing the metal cages then processing the inner bottle for scrap. The IBCs first arrive at the container receiving area where they are checked for residues and segregated based on their last held contents. The IBCs are then moved in batches to the container emptying and processing area where the cages are first removed then residues are drained from the bottle at a drain pan followed by a cut-and-scrape area. The container processing area has a dedicated drain pan for the removal of flammable liquid residues. This flammable liquids pan drains to a 55-gallon metal drum labeled as a hazardous waste satellite accumulation area. Following the removal

of liquid residues, the bottles are cut and any remaining solid residues are removed before the plastic bottle is shredded for scrap.

Near the container receiving area, the facility processes metal and plastic drums for scrap. The residues in the drums are drained into a trough which drains into an open tub.

A three-sided building on the north side of the facility serves as the waste storage area where wastes from the processing areas are stored.

The facility operates a wash line where IBC totes can be washed before being returned to service. This process is the primary generator of wastewater in the facility. Wastewater is accumulated in two storage tanks prior to shipment to Delta Water Processing for treatment and disposal.

The facility assembles new IBCs using the recycled cages and new plastic bottles.

We concluded the inspection day with a closing conference where we discussed our preliminary inspection findings.

We departed the facility at approximately 3:30pm Central Time.

For our detailed observations, inspection notes, and records request, see the Daily Summary for August 22, 2023, in Appendix 2.

Section III – PRELIMINARY FINDINGS

1) Waste Determination procedures - 40 CFR 262.11

The RCRA generator regulations require each solid waste generator to determine whether its waste is a listed hazardous waste or exhibits a hazardous waste characteristic at the waste's point of generation before management. This determination must be recorded and include all waste codes which apply to the waste. During our initial review of Centurion's records, we found that the facility had drained residues from containers with methyl ethyl ketone (MEK) and managed them under its ignitable liquid waste profile. This profile only identifies the D001 hazardous waste characteristic. Residues of MEK could also carry the D035 characteristic for MEK toxicity and the U159 listing for MEK. Based on this observation and the limited availability of waste determination records kept by the facility, we believe that Centurion has failed to fully characterize the residues removed from containers and has therefore likely shipped and disposed of hazardous waste without listing all waste codes associated with its waste.

2) Generator Category determination - 40 CFR 262.13

The RCRA regulations require hazardous waste generators to determine the amount of hazardous waste they generate on a monthly basis to determine their generator category. The Centurion facility is currently registered as a small quantity generator. However, it does not maintain an operating record showing the quantity of residual generation and is unable to document that the facility is operating under the appropriate generator category.

3) Closure of hazardous waste accumulation containers - 40 CFR 262.17(a)(1)(iv)(A) or 40 CFR 262.16(b)(2)(iii)(A) and 40 CFR 262.15(a)(4)

The container management standards for hazardous waste generators require containers accumulating hazardous waste to be kept closed unless waste is actively being added or removed. During this inspection we observed 2 containers which were in hazardous waste service and open when unattended and not being filled or emptied. During our inspection of the container emptying and processing area, we observed that the hazardous waste accumulation container at the flammable tote processing table had an open, unsecured lid. We observed that the hazardous waste container accumulating flammable

residues at the drum emptying trough was an open topped container and incapable of being closed. See Photos 1,2, and 4.

4) Failure to mark a hazardous waste accumulation container - 40 CFR 262.15 (a)(5)

The container management standards require small and large quantity generators to mark containers used for the accumulation of hazardous waste with: the words “Hazardous Waste” and an indication of the hazards associated with the waste. During this inspection, we found that the hazardous waste container accumulating flammable residues at the drum emptying trough was not marked as a hazardous waste accumulation container. See Photo 4.

5) Incompatible wastes - 40 CFR 262.15 (a)(3) and 262.16 (a)(2)(v)

The hazardous waste generator standards prohibit small and large quantity generators from introducing incompatible wastes to a hazardous waste container. The facility does not conduct an evaluation of waste compatibility prior to comingling residues from containers.

6) Illegal disposal of hazardous waste - 40 CFR 262.10(a)(3)

The RCRA regulations prohibit hazardous waste from being shipped or offered for shipment to an unpermitted facility. On July 28, 2022, Centurion shipped 2,500 lbs of waste that Centurion had determined exhibited the hazardous waste characteristic of ignitability to Phillips Reclamation Services on Manifest 017147756FLE. Following an independent analysis, Phillips Reclamation Services determined that the waste lacked sufficient heat value for fuel blending and rejected the waste back to Centurion on August 3, 2022, via Manifest 016778849FLE. No additional hazardous waste manifests for this waste were available at the time of this inspection. According to Darwin Guzman, he believes that this waste shipped to Republic’s Blue Ridge non-hazardous landfill for disposal.

7) Emergency Coordinator - 40 CFR 262.16(b)(9)

The RCRA regulations require small quantity generators of hazardous to identify and post contact information for a qualified employee to act as the emergency coordinator for the facility. The current emergency response document identifies an employee who is no longer employed by Centurion as an emergency coordinator.

8) Texas Notification Requirements - 30 TAC 335.6

The State of Texas’ authorized hazardous waste program requires hazardous waste generators to maintain an up-to-date Notice of Registration which identifies and fully describes the hazardous characteristics associated with their waste streams. Centurion’s Notice of Registration entry for waste flammable liquid heels (0007809H) only lists the D001 waste code for ignitability. During our inspection, we identified at least one waste stream (MEK) associated with other waste codes D035 and U159.

Section IV – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 2 – Daily Summary of Inspection Notes and Observations

APPENDIX 1
PHOTGRAPHIC LOG

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo Number	File Name		Date	Time	Photographer	Description
1	DSCN1127	.JPG	22-Aug-23	1028	John Penland	Hazardous waste accumulation container located at the flammable liquids table in the IBC emptying and processing area. Label detail. Lid unsecured.
2	DSCN1128	.JPG	22-Aug-23	1028	John Penland	Hazardous waste accumulation container located at the flammable liquids table in the IBC emptying and processing area. Label detail. Lid unsecured.
3	DSCN1129	.JPG	22-Aug-23	1036	John Penland	Drum emptying in the container receiving area. Flammable liquid drums being emptied.
4	DSCN1130	.JPG	22-Aug-23	1037	John Penland	Open-topped unlabeled container used for accumulation of waste residues from drum emptying in the container receiving area.
5	DSCN1131	.JPG	22-Aug-23	1040	John Penland	Hazardous waste accumulation container (275-gallon IBC) located in the waste storage area. Used for the consolidation of flammable liquid waste from the container
6	DSCN1132	.JPG	22-Aug-23	1040	John Penland	Hazardous waste accumulation container (275-gallon IBC) located in the waste storage area. Used for the consolidation of flammable liquid waste from the container
7	DSCN1133	.JPG	22-Aug-23	1046	John Penland	Front left of photo: 2 rejected IBC totes stored in the exterior storage area.
8	DSCN1134	.JPG	22-Aug-23	1052	John Penland	Containers of staged for emptying on the containr receiving area.
9	DSCN1135	.JPG	22-Aug-23	1055	John Penland	Facility procedures posted in the receiving area

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

[illegible]

WORKPLACE ACCUMULATION CONTAINER

Proper D.O.T. Shipping Name:
*UN 1993, Waste Flammable
Liquids, n.o.s (2001), 3PG11*

UN or NA# *1993*

General Information:
Name: *Centurion Container, LLC*
Facility: *Houston, TX*
Address: *8203 Market Street*
Phone: *713-444-9365*
City: *Houston*
State: *TX* Zip: *77029*
EPA ID No./Manifest Tracking No.:
State Manifest Tracking No.:
EPA Waste No.:

HAZARDOUS WASTE

Workplace Accumulation
Start Date: *03/14/2023*

Waste Accumulation
Area: *Bottle Destruction*

FEDERAL LAW PROHIBITS
IMPROPER DISPOSAL.

IF FOUND, CONTACT THE NEAREST
POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S.
ENVIRONMENTAL PROTECTION AGENCY.

HANDLE WITH CARE!

MANEJESE CON CUIDADO
CONTIENE DESPERDICIOS TOXICOS

www.accuforts.com • model# MH2W22

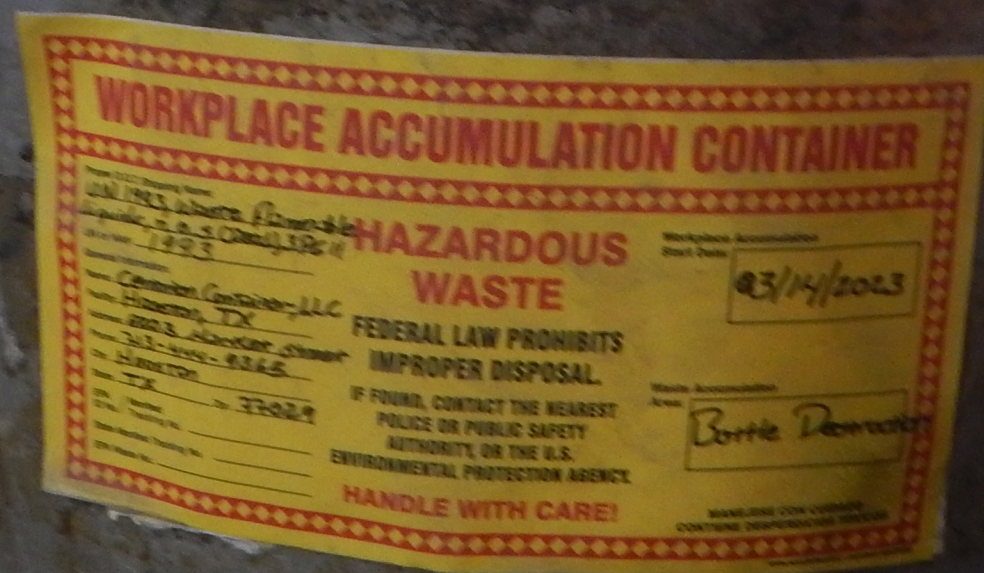




Photo 3



Photo 4



Photo 5



HAZARDOUS WASTE
FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION
NAME *Continion Containers, LLC*
ADDRESS *8203 Market Street*
CITY *Houston* STATE *TX* ZIP *77024*
EPA ID *TX000001028* STATE ID
ACQUISITION DATE *01/11/23* MANUFACTURE DATE
UN 1993, 3, Flammable liquid, n.o.s. (butyl, etc.)
HANDLE WITH CARE!





Photo 7



Photo 8

Never more than 1 inch



Hazardous Materials Received

DOT Placard

Class 1 - Explosives

Class 2 - Gases

Class 3 - Flammable Liquids

Class 4 - Flammable Solids

Class 5 - Oxidizing

Class 6 - Toxic

Class 7 - Radioactive

Class 8 - Corrosive

Class 9 - Miscellaneous

Hazardous Materials Not Permitted

Class 1 - Explosives

Class 2 - Gases

Class 3 - Flammable Liquids

Class 4 - Flammable Solids

Class 5 - Oxidizing

Class 6 - Toxic

Class 7 - Radioactive

Class 8 - Corrosive

Class 9 - Miscellaneous

P LIST: MUST BE TRIPLE RINSED

P-Listed
Required by USEPA Regulation:
Must be Triple Rinsed to Receive

RED LIST: MUST BE RINSED
NO HAZARD REMAINING

Required by Centurion Policy - Must be Rinsed or to Receive

YELLOW LIST: MUST BE DRIED
NO RESIDUE

Required by Centurion Policy - Must be Drip Dry - no residue remaining

SPECIAL HANDLING

Keep residues separate

P LIST: MUST BE TRIPLE RINSED

Known P Listed products in composite IBCs:
UN 1738 Benzyl Chloride
UN 2991 Carbamate/Oxamyl
UN 3017 Dimethoate

Product labels may be removed - if still on container should be crossed out or painted over. A triple rinsed label should also be on the container.

NOTE: All P listed materials are Class 6.1 Toxic

RED LIST: MUST BE RINSED - NO HAZARD REMAINING

Required by Centurion Policy
Must be Rinsed or to Receive

Class 1 - Explosives

Class 2 - Gases

Class 3 - Flammable Liquids

Class 4 - Flammable Solids

Class 5 - Oxidizing

Class 6 - Toxic

Class 7 - Radioactive

Class 8 - Corrosive

Class 9 - Miscellaneous

RED LIST: MUST BE RINSED

UN 3082 Class 9
2,4 d Herbicide

DO NOT MIX

Any Acid

Any Class 5.1

Any Class 5.2

YELLOW LIST: MUST BE DRIED - NO RESIDUE

Required by Centurion Policy
Must be Drip Dry - no residue remaining

Class 5.2 UN 3109 Peracetic Acid
Class 5.1 UN 2014 Hydrogen Peroxide
ALL OTHER Class 5.1/Class 5.2
Class 8 UN 1830/3264 2796 Sulfonic Acid
Class 8 UN 1789/3264 Hydrochloric Acid
Class 8 UN 1779 Formic Acid
Class 3 UN 1198 Formaldehyde

SPECIAL HANDLING REQUIRED

Keep residues separate:

- Hydrogen Bonded Silicone
- Part A Isocyanates
- Polymers

SPECIAL HANDLING

Hydrogen Bonded Silicone
Example AB Products

SPECIAL HANDLING

Hydrogen Bonded Silicone

- Must be Drip Dry to Receive
- Open Cap and Vent for 24 hours
- Keep residue separate - do not mix
- Known Products in IBCs:
AB: Andisil MH 20 and MH 30
AB: XL or CE products
ShinEtsu: 104HDM-RM
RUISIL: RJ-202
- All Silicones - Review labels for "Si-H", Methyl Hydrogen Silicone
- Example Warning Statements:

SPECIAL HANDLING

Part A /Isocyanates
(normally not DOT regulated)
Keep residue separate - Part A is water reactive - do not mix Part A with any other material - will create foam/polymer and will jam equipment
Part B is normally not reactive

EXAMPLE LABELS

SPECIAL HANDLING

Hydrogen Bonded Silicone
Example ShinEtsu/Ruisil Products

DO NOT MIX

Any Acid

Any Class 5.1

Any Class 5.2

Any Class 5.1

Most common: Hydrogen Peroxide UN 2014

P LISTED MUST BE TRIPLE RINSED

UN 1738
Benzyl Chloride
Required by Regulation:
Must be Triple Rinsed to Receive

EXAMPLE LABEL

RED LIST MUST BE RINSED

UN 1503/1590/3214
Class 5.1
Permanganates
Sodium Permanganate
Potassium Permanganate
(Material is normally purple/black)
Water Reactive

EXAMPLE

RED LIST MUST BE RINSED

UN 1755
Class 8
Chromic Acid

EXAMPLE

RED LIST MUST BE RINSED

UN 3287/3087
Class 8
Sodium Dichromate

EXAMPLE

RED LIST MUST BE RINSED

UN 1908
Sodium Chlorite
Water Reactive - look for vented cap

EXAMPLE

RED LIST MUST BE RINSED

UN 2810/2922
Glutaraldehyde
(Strong Odor)

EXAMPLE

RED LIST MUST BE RINSED

Any Class 5.2
UN 3109
Peracetic Acid
Strong Odor, do not mix with flammables

EXAMPLE



UN 31HA1/Y/074/USA/
+AA4494/3656/2031/
1040L/57kg/100kpa/
074/074

C.C.I. OH-PLUS

UN 1824

UN 1824, POTASSIUM
HYDROXIDE SOLUTION,
8, 20% EXCESSIVE
NAHCO₃



REJECTED

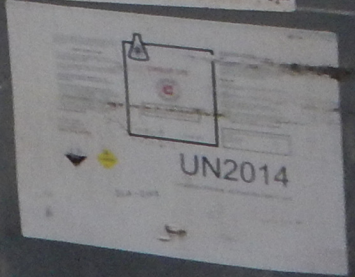
1824

8

CR6072

275 GAL

UN 31HA1/Y/22-22 USA/M4670
3175kg/2220kg/1040L/57kg/100kpa/22-22/22-22



UN2014

REJECTED

250 kg max



During Transport



8

Photo 11

UN 1824
HYDROXIDE
B, PG II, CC
NAERG.01

DANGER



REJECTED

This container is being rejected and returned because it still contains excessive amounts of valuable product and is **NOT EMPTY** according to EPA's definition in 40 CFR 261.7

Please empty, deface this notice, and return.

Received From CC-1-Aulford

Date Received 10-19-03

Trailer Number 3199S

275 GAL



Photo 13



Photo 14



Photo 15



Photo 16



Excluded Solvent-
Contaminated
(Hazardous)
LIQUIDS

1BH BND

APPENDIX 2

DAILY SUMMARIES

Penland, John

From: Penland, John
Sent: Thursday, August 24, 2023 9:12 PM
To: kay.robinson@centurioncontainer.com; Luis Cantu; Thapa, Sandesh
Cc: Pandak, Debra (she/her/hers)
Subject: Daily Summary for 2023 RCRA inspection of Centurion Container LLC - Houston, TX - August 22, 2023

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

Introduction

On August 22, 2023, I, John Penland, will be conducting an unannounced inspection of the Centurion Container LLC. (Centurion) facility located at 8203 Market St in Houston, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). I will be assisted on this inspection by Environmental Protection Agency (EPA) inspector Sandesh Thapa. 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

The Centurion facility was targeted for inspection as part of the Region 6 response to EPA's November 2022 [Drum Reconditioner Damage Case Report](#).

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Sandesh Thapa	Asst. Hazardous Waste Inspector	US EPA Region 6	214-665-2265	Thapa.sandesh@epa.gov
Luis Cantu	SHEQ Manager	Centurion	504-579-9598	Luis.cantu@centurioncontainer.com
Darwin Guzman	Plant Manager	Centurion	832-721-4262	

Daily Summary

- Initial Entry to the facility - approximately 10:00 am
- Opening meeting start – 10:05 am
 - I presented my credentials to Mr. Luis Cantu and informed him that we were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act
 - We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—

- (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
 - We discussed the purpose of EPA's inspection – In response to the Drum Reconditioner Damage Case Report, this inspection is intended to: Assess the Centurion facility's regulatory status (ie, VSQG, SQG, or LQG); Evaluate the facility's waste identification and characterization procedures; and Identify facility operations which could pose a risk of release of hazardous waste or hazardous constituents to the air, water, or land.
 - Discussed the right of Centurion to assert a Confidential Business Information claim for records requested by EPA (see attachment)
 - Discussed the process for transferring electronic records – EPA has set up a  [Microsoft OneDrive folder](#) with access limited to the inspection participants.
 - Discussed the inspection process – the onsite inspection will be conducted on August 22, 2023. The records review will be conducted by the inspectors independently offsite who will remain in the area throughout the week for additional records delivery if needed. Daily summaries will be provided by the inspectors at the end of the onsite inspection day to ensure a clear communication of questions and findings.
- General Facility Process – The Centurion facility is an Intermediate Bulk Container manufacturing and reconditioning facility located in Houston, Texas. This process generates: wastewater; used ppe; and residues removed from the containers.
 - Initial request for compliance records, including:
 - Facility Maps identifying solid waste management units, if available
 - Facility waste profiles for any solid waste generated since 2020. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge; see 40 CFR 262.11(f))
 - Facility SOPs and documents related to the exclusion of certain categories of container residues
 - Facility SOPs and documents related to the characterization of container residues
 - Facility SOPs and documents related to the generation or management of container residues
 - Facility SOPs related to the stabilization or neutralization of container residues
 - Operation logs recording the processing of containers which previously held materials characterized by Centurion as Flammable Liquids for January 1, 2023 to August 21, 2023.
 - Facility Walkthrough
 - Beginning at approximately 10:30am- This walkthrough of the facility was focused on familiarizing the inspection team with the function and layout of the process and to identify readily apparent management concerns.
 - Container Receiving
 - Receive containers from offsite at reconditioning dock.
 - Containers are visually inspected to ensure that they are received RCRA empty – The facility states that it rejects totes with more than 1 inch of residue or heel. However, during our inspection we observed the facility empty a tote with more than 1-inch of flammable liquid residues.
 - Non-empty containers are set aside in a “quarantine area” and rejected to the originator – The oldest container found in this area was April 2023
 - Container last held contents are reviewed by operators to classify the containers for processing.
 - Container Emptying and Processing
 - Containers are processed in groups based on the last held classification which is separate the flammable residues from the non-flammable residues. – Note: the facility's characterization

does not account for any other characteristics; therefore, this process is entirely dependent on Centurion's residue acceptance criteria.

- Cages are disassembled and poly-bottles removed for emptying and recycling.
- Bottles are cut and any residues are poured or scraped out into a residuals drum.
 - Flammable residues are poured using a metal draining table which directs the liquids to a 55-gallon drum. This drum is emptied into a tote located in an outdoor storage area.
 - We found this container open at the time of our inspection. The lock ring which secures the lid was not present.
 - Non-flammable residues are poured or rinsed into a 275 gallon tote which is labeled as non-haz wash water.
- Metal drums processed for scrap metal are emptied into a trough which drains to an open-topped container. – The facility was emptying 55-gallon drums of 4-chlorobenzotrifluoride (CAS: 98-56-6), a flammable waste (FP:117F) in this trough when first observed. Drums of m-Xylylenediamine were staged in the area to process afterward.
- After the removal of residues, sawdust is scooped into the cut container to absorb the remaining residues and then placed into hopper as a non-hazardous waste. This hopper is later consolidated into a roll-off container located in the waste storage area.
- The cut container remnants are compacted and sent offsite for recycling.
- Waste Storage Area
 - The facility's hazardous and non-hazardous wastes are stored in an outdoor storage area in a three-walled metal building located on the north side of the property.
 - Flammable wastes are consolidated into a single 275-gallon IBC. The facility does not evaluate chemical compatibility of the wastes.
 - A roll-off container is located in this area for the accumulation of the waste sawdust absorbent.
- Outdoor IBC storage area
 - Empty IBC totes are stored in this area east of the main building.
 - 2 rejected containers with excess heel were found during our inspection of this area. Both were received in October of 2022. (October 14 and 26). These containers were moved to the quarantine area upon discovery.
- Wash Line
 - Used IBCs which are only received for cleaning and return to the customer are processed in the wash line.
 - Contaminated rinse waters are transferred to two storage tanks for accumulation prior to treatment and disposal through Delta Water Processing (a Centralized Wastewater Treatment Facility).
- Facility Operations Discussion
 - Following the facility walkthrough we discussed the regulatory applicability of RCRA to the processes we observed during the walkthrough.
 - Especially of note is that the exemption that applies to residues remaining in RCRA-empty containers only applies while those residues remain in their original container. Any residues removed from the container are subject to full regulation at the time they are removed. This includes the waste determination provisions of 40 CFR 262.11; the waste counting provisions of 40 CFR 262.13; and the Land disposal restrictions in 40 CFR part 268.
 - Please note that this is distinct from rinsates generated during the washing of containers which, while also subject to regulation when removed from the container, may exhibit different properties than the original residues and may also be a wastewater which may be managed in a CWA tank system.
 - Our initial review of SDS records associated with containers which last held flammable liquids show that these residues are likely to exhibit the hazardous waste characteristic of ignitability due to their flash point of <140F. However, we also identified last held contents which include Methyl Ethyl Ketone. Residues of this waste would carry the waste codes D035 and U159. Additional review of these records will be necessary to evaluate the waste determination program at Centurion.

- The operating records which show the processing of containers do not record the quantity of residues removed. As of this inspection we are unable to count the waste generation at the facility due to the insufficiency of these records.
- Preliminary Findings
 - 40 CFR 262.11 – Waste Determination procedures.
 - The Centurion facility has failed to fully characterize the residues removed from containers and has therefore likely shipped and disposed of hazardous waste without listing all waste codes associated with its waste.
 - 40 CFR 262.13 – Generator Category determination
 - The Centurion facility is currently registered as a small quantity generator. However, its failure to maintain an operating record showing the quantity of residual generation means that the facility is unable to document that the facility is operating under the appropriate generator category.
 - 40 CFR 262.15(a)(4) – Closure of hazardous waste accumulation containers
 - During our inspection we observed that the hazardous waste accumulation container at the flammable tote processing table had an open, unsecured lid.
 - During our inspection we observed that the hazardous waste container accumulating flammable residues at the drum emptying trough was an open topped container and incapable of being closed.
 - 40 CFR 262.15 (a)(5) – Failure to mark a hazardous waste accumulation container
 - During our inspection we observed that the hazardous waste container accumulating flammable residues at the drum emptying trough was not marked as a hazardous waste accumulation container.
 - 40 CFR 262.15 (a)(3) and 262.16 (a)(2)(v) – Incompatible wastes
 - The facility does not conduct an onsite evaluation of waste compatibility prior to comingling residues from containers.
 - 40 CFR 262.10(a)(3) – Illegal disposal of hazardous waste
 - Manifest 017147756FLE for 2,500 lbs of flammable hazardous waste was shipped on July 18, 2022 and rejected by Phillips Reclamation Services on July 27, 2022.
 - The rejected load was returned to Centurion on August 3, 2022 via Manifest 016778849FLE.
 - No additional hazardous waste manifests for this waste were available at the time of this inspection
 - According to Darwin Guzman, this may have been shipped to Republic's Blue Ridge landfill.
 - 40 CFR 262.16(b)(9) Emergency Coordinator
 - The current emergency response document identifies an employee who is no longer employed by Centurion as an emergency coordinator. This document needs to be updated.
 - 30 TAC 335.6 – Texas Notification Requirements
 - The Texas waste code that is associated with the flammable heels generated and shipped for disposal from the Centurion facility (0007809H) only lists the D001 waste code. During our inspection we identified at least one waste stream (MEK) associated with other waste codes.
- Departed Facility at approximately 3:30pm

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