

## **RCRA Inspection Report**

### **1) Inspectors and Authors of Report**

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### **2) Facility Information**

Pinewood Site Custodial Trust  
8430 Camp Macboykin Road  
Pinewood, South Carolina 29125  
Sumter County  
EPA ID No. SCD070375985

### **3) Responsible Officials**

Mr. Brian Burgess  
Pinewood Site Manager

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Robert A. Kerr, Jr.  
President, Pinewood Trustee, Inc.

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### **4) Inspection Participants**

Brian Burgess, Sumter Transport Company  
Bryan J. Williams, GEL Engineering, LLC  
Kevin Anders, S and G  
Gerald Shealy, South Carolina Department of Health and Environmental Control  
Christopher Watson, South Carolina Department of Health and Environmental Control  
Jarod Woodard, South Carolina Department of Health and Environmental Control  
William Kappler, U. S. Environmental Protection Agency, Region 4

### **5) Date of Inspection**

June 15, 2022

### **6) Applicable Regulations**

South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 et seq.,  
[Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code—Annotated

U.S.C.A. 6925 and 6927)], and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279 [40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279].

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.124, 264-267, and 270, and S.C. Code Ann. Regs. 61-79.262.16(b) or R.61-79.262.17(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15 (a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").**

**Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Sections 44-56-60(a)(2) and (b) of the S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.124, 264-267, and 270, provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], (hereinafter referred to as the "LQG Permit Exemption").**

## **7) Purpose of Inspection**

The purpose of this inspection was to determine the Pinewood Site Custodial Trust, (hereinafter, "PSCT" or the "facility") compliance with the applicable requirements of RCRA and the corresponding South Carolina Department of Health and Environmental Control (SCDHEC) regulations. This was an EPA lead inspection.

## **8) Previous Inspection History**

PSCT was inspected by the SCDHEC on March 4, 2021. The inspector observed the facility failed to document the type and amount of RCRA training given to each person.

PSCT was inspected by the EPA on February 22, 2016. The inspector observed the facility failed to record a daily tank inspection and failed to record the time on the daily tank inspection logs.

## 9) **Facility Description**

PSCT is located at 8430 Camp Macboykin Road, (SC County Road 51) Pinewood, Sumter County, South Carolina. The facility is in a rural area of Sumter County between Summerton and Pinewood. The facility is located on 275 acres of property within the fenced area. The property is owned by Pinewood Trustee, Inc. The facility employs approximately eight people and operates seven days per week on one shift from 5:00 a.m. to 5:00 p.m. The facility consists of five buildings. Non-potable well water services the facility and domestic waste is serviced by a septic tank. The primary NAICS code for the facility is 562211 Hazardous Waste Treatment and Disposal.

PSCT submitted a RCRA Site Identification form notifying of its regulated waste activity to SCDHEC on March 2, 2020. The facility notified as a large quantity generator of hazardous waste (LQG) and a small quantity handler of universal waste (SQHUW). SCDHEC issued PSCT a HSWA permit modification (permit number SCD070375985) on June 16, 2004. The Permit is for the closure, identification, and corrective action for Solid Waste Management Units (SWMUs), and the post-closure care for the hazardous waste disposal facility located at 8430 Camp Macboykin Road, in Sumter County.

PSTC is a closed commercial hazardous waste treatment, storage, and disposal facility. PSCT received hazardous and nonhazardous waste until 2000, when site closure began. PSCT closed in 2003 following a bankruptcy settlement. All landfill cells are closed and capped. The site is expected to remain in post-closure care under a RCRA post-closure permit issued by SCDHEC.

Kestrel Horizons, LLC (Kestrel) acted as Trustee from 2003 to October 2014. Pinewood Trustee, Inc., is the current facility Trustee. Sumter Transport Company (STC) manages the site's operations including maintenance and waste handling activities.

Post-closure care activities at the site include management of the landfill leachate and its treatment residue, maintenance of the landfill cap, surface water management, and implementation of a groundwater-monitoring program. The landfill has a double leachate collection system. The leachate from the primary collection system is accumulated in sumps and transferred to the Central Tank Farm (CTF) via underground pipes. The landfill's primary leachate collection system has 45 sumps. Photograph 15 shows a primary sump pump enclosure. The leachate from the secondary collection system is also accumulated in sumps; however, it is transferred to the CTF by truck. The landfill has 23 secondary leachate accumulation sumps. The leachate is a listed hazardous waste, F039 and has been found to exhibit the hazardous waste characteristic of toxicity for arsenic (D004), 1,2-Dichloroethane (D028), Tetrachloroethylene (D039) and Trichloroethylene (D040).

The CTF consists of a building containing ten 40,000-gallon vertical aboveground steel tanks and a leachate offloading station. The CTF is constructed with a concrete secondary containment system and a metal roof. The tanks in the CTF are used for temporary storage of the leachate prior to treatment in the on-site Leachate Treatment System (LTS). The LTS is in a building adjacent to the CTF. The LTS building has a 6-inch concrete curb, a lined trench and drain system and a sump to collect releases. The sump has a level float switch that triggers an alarm that is connected to a central control system. The liquid collected in the sump is pumped with a

vacuum truck or other means and transferred to the CTF.

The LTS is comprised of six tanks (T-200, T-600, T-210, T-700, T-002A, and T-900), a filter press, two dryers, an evaporator and associated pump system. All units are vented through a single stack in the building. According to the construction air permit application, the evaporator has no air emission control devices. The facility was issued a conditional major operating permit from the SCDHEC Bureau of Air Quality on October 11, 2017, for the emissions from the LTS's evaporator, tanks, filter press and dryers. The permit expires on December 31, 2022.

The LTS is a batch operation and includes flocculation, dewatering, evaporation, and drying. The first unit in the LTS is tank T-200, which serves as the holding/mixing tank. The maximum batch size treated in tank T-200 is 6,400 gallons. In tank T-200, the leachate is mixed with either sulfuric acid and/or caustic soda solution and mixed with perlite. The perlite is reported to facilitate removal of the precipitate in a downstream filter press. After mixing is complete, the entire content of the mixing tank is pumped to tank T-210. PSTC refers to the output of tank T-200 as a "sludge." The sludge is mixed with a conditioner and the sludge is pumped from tank T-210 to the filter press, designated as unit FLT-600.

The conditioned sludge is pressed in FLT-600, to remove liquid from the sludge. The FLT-600's liquid phase (filtrate) is pumped to tank T-700, while the pressed sludge is fed to the sludge drier. The sludge is accumulated in a roll-off container. Once the roll-off is full, the sludge is shipped off-site as an D012/F039 hazardous waste.

Tank T-700 is used as the feeding tank for the evaporator, unit E-800. The evaporator is a propane fired unit and operates at a temperature range between 212 degrees Fahrenheit and 250 degrees Fahrenheit. The residue (slurry) from the evaporator, is pumped to tank T-900, which fed the slurry dryer, unit D-901. The slurry dryer has not been operating since 2017. The slurry is shipped off-site as an F039 listed hazardous waste.

## 10) **Opening Conference**

On June 15, 2022, EPA inspector William Kappler, accompanied by SCDHEC inspector Gerald Shealy, Christopher Watson, and Jarod Woodard, arrived at PSCT at approximately 9:00 am. The facility is surrounded by a chain-link fence and an automated gate. A call box is used to contact the main office to announce visitors. Mr. Brian Burgess, of STC received the inspectors in the main office and proceeded to a conference room for an opening conference. The inspectors were joined in the conference room by Mr. Bryan J. Williams and Mr. Kevin Anders. The inspectors introduced themselves, presented their credentials and explained the purpose of the visit. The EPA inspector described the anticipated use of a digital camera during the inspection, and discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. The EPA's information sheet for small businesses, can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

During the opening conference, facility representatives provided an overview of the facility's history and current operations. The inspection participants also discussed health and safety protocols, the required personal protective equipment and watched a site safety video, prior to Mr. Burgess and Mr. Williams leading the inspectors on a tour of the facility operations.

## 11) **Findings**

### Auxiliary Tank Farm

The auxiliary tank farm (ATF) consists of two 40,000-gallon capacity horizontal aboveground tanks. The inspector observed a sign identifying the ATF with the words "auxiliary tank farm hazardous waste accumulation area". Mr. Burgess indicated that the tanks were empty and hazardous waste has not been stored in the tanks. When in use, they would be used for leachate from the landfills secondary leachate collection system. The inspector did not observe hazardous waste in this area at the time of the inspection.

### Waste Pile Building #2

The Waste Pile Building #2 (WP2) was used for storing hazardous waste piles while the landfill was in operation. Currently, PSCT uses the WP2 to store hazardous waste containers for 90-days or less prior to shipping them off-site. The WP2 is not covered by the facility's post-closure care permit. The inspectors observed one SAA container accumulating personal protective equipment (PPE) and debris. The container was closed, labeled with words "hazardous waste", marked with the waste code F039, and labeled with a #9 miscellaneous pictogram. The inspector did not observe a hazard indicator for the characteristic of toxicity on the container (Photograph 1). Mr. Burgess marked the hazardous waste label with the word "toxic", indicating the hazard (Photograph 2). The inspectors also observed two 55-gallon containers storing hazardous waste. The containers were closed, labeled with words "hazardous waste", marked with the waste code F039, marked with the dates May 17, 2022 and June 8, 2022, and labeled with a #9 miscellaneous pictogram. The inspector did not observe a hazard indicator for the characteristic of toxicity on the containers (Photograph 3). Mr. Burgess marked the hazardous waste label on each container with the word "toxic", indicating the hazard (Photograph 4).

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

**Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(B) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents.**

### Central Tank Farm

The Central Tank Farm (CTF) is for the temporary storage of the leachate pumped from the

landfill, prior to treatment in the Leachate Treatment System. The inspectors observed a sign posted on a metal beam with the words “central tank farm hazardous waste accumulation area”. The concrete secondary containment system and pad appeared in good condition. The inspectors observed one empty 3,300-gallon capacity vacuum truck that was closed, labeled with the words “hazardous waste”, marked with the date April 16, 2022, and labeled with a #9 miscellaneous pictogram. Mr. Burgess marked the hazardous waste label with the word “toxic”, indicating the hazard (Photographs 5 and 6). The inspectors observed one empty 3,250-gallon capacity vacuum truck that was closed, labeled with the words “hazardous waste”, and labeled with a #9 miscellaneous pictogram. Mr. Burgess marked the hazardous waste label with the word “toxic”, indicating the hazard (Photographs 7 and 8). The inspectors observed one 1,100-gallon capacity polyethylene container on a trailer. The inspectors observed the container was closed, labeled with the words “hazardous waste”, marked with the date May 26, 2022, and labeled with a #9 miscellaneous pictogram. Mr. Burgess marked the hazardous waste label with the word “toxic”, indicating the hazard (Photographs 9 and 10). The inspectors also observed one 55-gallon SAA container accumulating PPE and debris generated on the CTF pad. The container was closed, labeled with the words “hazardous waste”, and labeled with a #9 miscellaneous pictogram. Mr. Burgess marked the hazardous waste label with the word “toxic”, indicating the hazard (Photograph 11).

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

**Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(B) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents.**

Mr. Burgess indicated that tank #3 was accumulating hazardous waste. Based on the electronic level gauge the inspector read a level of 6,779-gallons in tank #3. The tank was labeled with the words “hazardous waste”, marked with the date June 2, 2022, and labeled with a #9 miscellaneous pictogram. Mr. Burgess marked the hazardous waste label with the word “toxic”, indicating the hazard (Photographs 12 and 13). Mr. Burgess indicated tank #4 was empty.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(ii)(B) [40 C.F.R. § 262.17(a)(5)(ii)(B)], which is a condition of the LQG Permit Exemption, mark or label its tanks with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with**

**the National Fire Protection Association code 704).**

Superior Industrial Maintenance (SIM)

PSCT contracted SIM to conduct renovation operations on the tank interior and exterior surfaces. The renovations include sandblasting and painting operations on the tanks and on the tank farm stairs. At the time of the inspection, SIM was conducting renovation work on the empty tanks. The inspector observed two-part epoxy paints, paint thinner and methyl ethyl ketone (MEK) solvent products in this area. The inspector observed an unmarked/unlabeled five-gallon container of liquid with a paint brush immersed in the container. The inspector observed approximately 0.25 gallons of liquid in the container, apparently cleaning the brush. The inspector observed the container was kept closed. The SIM supervisor indicated brushes and spray tip equipment and nozzles are cleaned using the solvents. The inspectors explained to Mr. Burgess and Mr. Williams that PSCT should ensure the contactor is properly managing hazardous waste if generated from the sandblasting and painting operations. Mr. Burgess indicated hazardous waste management will be discussed with SIM.

Leachate Treatment System (LTS) Building

At the time of the inspection, six hazardous waste tanks (T-200, T-600, T-210, T-700, T-002A, and T-900), were observed. The tanks were labeled with the words “Hazardous Waste”, with the EPA waste code F039 and appeared to be in good condition. The inspectors observed a roll-off container accumulating sludge. The container was closed, labeled with the words “hazardous waste”, and marked with the date May 10, 2022. The container was not marked with an indication of the hazard.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(B) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents.**

The inspector observed one 55-gallon SAA container accumulating PPE and debris. The container was closed and labeled with the words “hazardous waste”. The container was not marked with an indication of the hazard.

The inspector observed the T-200 Mix Tank identified with a sign with the words “hazardous waste” and labeled with a #9 miscellaneous pictogram (Photograph 14).

The inspector observed one 35-gallon SAA container next to the T-200 Mix Tank. The container was closed and labeled with the words “hazardous waste”. The container was not marked with an indication of the hazard.

The inspector observed one 35-gallon SAA container (T-002A) next to Tank T-210. The container was closed and labeled with the words “hazardous waste”. The container was not marked with an indication of the hazard.

The inspector observed one 35-gallon SAA container (T-002D) next to the slurry dryer. The container was closed and labeled with the words “hazardous waste”. The container was not marked with an indication of the hazard.

The inspector observed one 35-gallon SAA container (T-001) next to the fume hood. The container was closed and labeled with the words “hazardous waste”. The container was not marked with an indication of the hazard.

Mr. Burgess marked each container with the word “toxic”, indicating the hazard.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

#### Landfill - Section 1

The inspectors observed pump enclosure 1A1 which pumps landfill leachate to the CTF (Photograph 15). The inspectors observed the landfill cover appeared in good condition.

#### Universal Waste

Mr. Burgess indicated there was no universal waste at the facility at the time of the inspection.

#### Waste Management

PSCT generates hazardous waste leachate F039 for storage in the CTF and treatment in the LTS. Hazardous waste solids D004, D006, D012, D028, D029, D030, D035, D040, D043, F039 and hazardous waste liquids D004, F039 is also generated.

The facility prepares the hazardous waste for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to an off-site treatment, storage, or disposal facility (TSDF).

#### PSCT used the following transporters in 2021 and 2022

STC Industrial, LLC–SCR000784884

Veolia ES Technical Solutions–NJD080631369

#### PSCT used the following TSDFs in 2021 and 2022

Clean Harbors of Baltimore, Inc.,–MDD980555189

Veolia ES Technical Solutions–TXD000838896

#### Record Review

The inspectors observed the permit and permit application was maintained on-site. The inspectors reviewed the laboratory analysis report on waste paint chips sandblasted from the tank, hazardous waste manifests for 2020 to the present, the quarterly reports, the contingency plan and quick reference guide, weekly and daily inspection logs, RCRA training given to supervisors and operators and training records. The inspectors requested the facility electronically submit a record of the last shipment of universal waste. The universal waste record

was email to EPA on June 16, 2021. The last shipment of universal waste was for a shipment of waste lamps on June 15, 2017.

12) **Closing Conference**

Upon conclusion of the inspection, a closing conference was conducted in the presence of Mr. Brian Burgess and Mr. Bryan J. Williams. The inspector informed the facility of the preliminary conclusions based on the areas inspected.

13) **Inspection Findings**

PSCT was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste. Based on the observations during the inspection, PSCT was apparently deficient with the following RCRA requirements:

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

**Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(B) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents.**

**Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(ii)(B) [40 C.F.R. § 262.17(a)(5)(ii)(B)], which is a condition of the LQG Permit Exemption, mark or label its tanks with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

14) **List of Appendices**

Appendix 1–Photograph Log:  
Photos taken on: June 15, 2022  
Photos taken by: William Kappler  
Samsung Camera (Model WB250F)  
EPA Property Tag# S75917

15) **Signed**

**WILLIAM KAPPLER**

Digitally signed by WILLIAM  
KAPPLER

Date: 2022.07.20 09:15:13 -04'00'

\_\_\_\_\_  
William Kappler  
Physical Scientist

\_\_\_\_\_  
Date

**Concurrence**

**ARACELI CHAVEZ**

Digitally signed by ARACELI CHAVEZ  
Date: 2022.07.20 13:14:53 -04'00'

\_\_\_\_\_  
Araceli B. Chavez  
Chief  
RCRA Enforcement Section

\_\_\_\_\_  
Date

Appendix 1 – Pinewood Site Custodial Trust  
RCRA CEI Photographs  
William Kappler, US EPA



Waste Pile Building #2. 90-Day Area. The inspector observed two 55-gallon containers of hazardous waste without a toxic hazard indicator. Photograph 1 taken at 10:18 a.m.



Waste Pile Building #2. The inspector observed one 55-gallon SAA container of hazardous waste without a toxic hazard indicator. Photograph 2 taken at 10:18 a.m.



Waste Pile Building #2. 90-Day Area. The inspector observed PSCT mark the two 55-gallon containers of hazardous waste with the word “toxic”. Photograph 3 taken at 10:18 a.m.



Waste Pile Building #2. The inspector observed PSCT mark the one 55-gallon SAA container of hazardous waste with the word “toxic”. Photograph 4 taken at 10:18 a.m.

Appendix 1 – Pinewood Site Custodial Trust  
RCRA CEI Photographs  
William Kappler, US EPA



Central Tank Farm. The inspector observed the 3,300-gallon vacuum truck not marked with a toxic hazard indicator. Photograph 5 taken at 10:27 a.m.



Central Tank Farm. The inspector observed PSCT mark the 3,300-gallon vacuum truck with the word “toxic”. Photograph 6 taken at 10:27 a.m.



Central Tank Farm. The inspector observed the 3,250-gallon vacuum truck not marked with a toxic hazard indicator. Photograph 7 taken at 10:29 a.m.



Central Tank Farm. The inspector observed PSCT mark the 3,250-gallon vacuum truck with the word “toxic”. Photograph 8 taken at 10:29 a.m.

Appendix 1 – Pinewood Site Custodial Trust  
RCRA CEI Photographs  
William Kappler, US EPA



Central Tank Farm. The inspector observed PSCT mark the 1,100-gallon container with the word “toxic”. Photograph 9 taken at 10:32 a.m.



Central Tank Farm. The inspector observed the 1,100-gallon container on a trailer. Photograph 10 taken at 10:32 a.m.



Central Tank Farm. The inspector observed PSCT mark the 55-gallon SAA container with the word “toxic”. Photograph 11 taken at 10:34 a.m.



Central Tank Farm. The inspector observed PSCT mark Tank #3 with the word “toxic”. Photograph 12 taken at 10:38 a.m.

Appendix 1 – Pinewood Site Custodial Trust  
RCRA CEI Photographs  
William Kappler, US EPA



Central Tank Farm. The inspector observed PSCT mark Tank #3 with the word “toxic”. Photograph 13 taken at 10:38 a.m.



Leachate Treatment System. The inspector observed PSCT mark the T-200 Mix Tank with the word “toxic”. Photograph 14 taken at 10:59 a.m.



Landfill Section 1. The inspector observed pump enclosure 1A1. Photograph 15 taken at 11:24 a.m.