

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

AMAZON.COM SERVICES LLC-MLI1

2022 Research Parkway
Davenport, Iowa 52806
563-321-8041

EPA ID Number: IAR000528091

On

October 14, 2024

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U. S. Environmental Protection Agency (EPA) Region 7, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Amazon.com Services LLC-MLI1 (Amazon) at 2022 Research Parkway in Davenport, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

Amazon:

Derrick Barry, Safety Manager
Cristal Valdez, Regulator Waste Coordinator
Neil Lyron, Workplace Health and Safety (WHS) Specialist

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Amazon on October 14, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 8:05 a.m., I approached the main entrance and explained the purpose of the CEI to the security guard. Messrs. Barry and Lyron met me in the main office lobby approximately 5 minutes later. I introduced myself and explained the purpose of the CEI. Messrs. Barry, Lyron, and I adjourned to a conference room where I conducted an entry briefing with them.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Barry and Lyron. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Barry would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Messrs. Barry and Lyron a copy of U. S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

A copy of each of the following documents was left with Mr. Barry during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information

The following documents were emailed to Mr. Barry after the inspection:

- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Mr. Barry (Attachment 1). Based on this review, I deleted Mr. Vidal Vijaykumar (Business Environmental Leader) as the site contact and added Mr. Barry's name and contact information to the Site Contact Information section. Mr. Barry stated that he has been in his position for 1 week and that Mr. Lyron has been in his position for 1 year (with two years of experience at another Amazon facility). I made no other changes to the Verification Report.

I conducted the visual inspection of the facility, accompanied by Messrs. Barry and Lyron. Following the visual inspection, I reviewed facility records, including hazardous waste manifests with land disposal restriction (LDR) notifications, contingency plan, inspection records, and training documentation. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Ms. Valdez and Messrs. Barry and Lyron. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Barry signed, acknowledging receipt (Attachment 2). I provided Mr. Barry the Notice, which he signed indicating that confidential business information (CBI) had been provided (Attachment 3). Specifically, Mr. Barry asserted a CBI claim for the facility's contingency plan. I also provided Mr. Barry a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 4).

A map of the facility obtained during the CEI is included as Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. The 12 photographs taken during the CEI are included in Attachment 7, all of which are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Amazon operates as a warehouse shipping point for consumer products distributed under the Amazon label. The facility receives bulk packaged consumer products from various manufacturers world-wide. These products are sorted, repackaged, warehoused and shipped to Amazon, United States Postal Service, United Parcel Service, and Amazon Prime as needed.

Amazon has been operating at its current location since October 14, 2023, and consists of a single five-story warehouse building with 3,575,548 square feet under roof. The facility operates 24 hours per day, 7 days per week. Approximately 2,900 employees work one of three 8-hour shifts (6:00 a.m. to 2:00 p.m., 2:00 p.m. to 10:00 p.m., and 10:00 p.m. to 6:00 a.m.). Amazon's primary North American Industry Classification System (NAICS) code is 493110 (General Warehousing and Storage).

Most wastes generated by facility operations consist of waste consumer commodities. Mr. Barry explained that waste consumer commodities are damaged products. Waste consumer commodities can be hazardous or nonhazardous waste, with hazardous waste determinations based on product knowledge. Ms. Valdez explained that when a product is damaged, the operator looks up the safety data sheets (SDS) for the constituents of the product and a hazardous waste determination is made from the SDS. If the damaged product is determined to be hazardous, it is

immediately transferred to the hazardous waste central accumulation area (HWCAA). Hazardous waste consumer commodities are accumulated in the HWCAA and shipped off site for hazardous waste disposal. Nonhazardous waste consumer commodities are primarily stored on warehouse racks and are shipped off site for nonhazardous waste disposal.

Equipment and facility maintenance generate used oil, waste batteries, used lamps, waste aerosol cans, and general trash. Used oil generated during routine equipment maintenance is accumulated in a 55-gallon used oil storage container. Used oil is managed according to Title 40 *Code of Federal Regulations* (40 CFR) Part 279 and is shipped off site for recycling. Waste batteries and waste aerosol cans are primarily waste consumer commodities but may also include waste batteries and aerosol cans generated at the facility during maintenance. Waste batteries and waste aerosol cans are managed as universal wastes according to 40 CFR Part 273. Used lamps consist of light emitting diode (LED) lamps generated during facility maintenance, as well as waste consumer commodities. The facility manages all waste lamps as universal waste according to 40 CFR Part 273. Universal wastes are shipped off site for recycling. General trash is considered nonhazardous and is accumulated in various containers and a compactor. General trash is collected for landfill disposal.

Amazon has not previously been inspected by EPA.

2. RCRA Status

Amazon is identified on the Notification Acknowledgement/Verification Report provided by EPA (Attachment 1) as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] or 2,200 pounds of hazardous waste per month, or accumulating more than 1 kg or 2.2 pounds of acute hazardous waste at any time). According to Mr. Barry, Amazon is currently operating as a LQG of hazardous waste. During the CEI, I reviewed all hazardous waste manifests from October 2023 through 2024 to date. A summary of the hazardous waste quantities from these manifests is below.

Date	Pounds	Waste Code	Total per month
10/26/23	39	D002	39 pounds
11/08/23	64	D002	64 pounds
01/19/24	55	D001	55 pounds
03/14/24	153	D002	153 pounds
04/04/24	72	D002, D007	72 pounds
05/02/24	586	D001, D002, D007	
05/09/24	302	D001	
05/30/24	1621	D001, D002, D005	2,509 pounds
06/06/24	202	D002, D007, D008, D010	
06/20/24	134	D002	336 pounds
07/18/24	22	D001, P075	
07/25/24	17	D001, D002	39 pounds
08/2/24	86	D002	
08/15/24	238	D001, D002	
08/29/24	497	D001, D002	821 pounds

Date	Pounds	Waste Code	Total per month
09/05/24	97	D002	
09/11/24	224	D001, D002	
09/19/24	120	D001	
09/20/24	284	D002, D007, D008, D010	
09/26/24	273	D002	998 pounds
10/03/24	485	D002	485 pounds

The primary hazardous wastes generated at Amazon are hazardous waste consumer commodities that are damaged. Types and quantities of hazardous waste consumer commodities vary significantly from month to month. Mr. Barry stated that the hazardous waste generation rate is increasing as the facility is ramping up for more distribution of products. Based on shipping records, it appears that the facility currently operates as a small quantity generator (SQG) of hazardous waste (generating between 100 and 1,000 kg or 220 and 2,200 pounds of hazardous waste per calendar month) most months. However, based on the shipment of 2,509 pounds of hazardous waste in May 2024, and 7 pounds of P075 acute hazardous waste in July 2024, I inspected Amazon as a LQG of hazardous waste. I also inspected Amazon as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time) and a used oil generator.

Amazon does not operate any satellite accumulation areas (SAA) for accumulation of hazardous waste. All hazardous wastes are accumulated in the HWCAA. I inspected the HWCAA during the CEI.

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and my review of waste shipping documents. Messrs. Barry and Lyron accompanied me during the visual inspection. Ms. Valdez joined the CEI during the visual inspection of the HWCAA. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

Hazardous waste consumer commodities include damaged consumer products that are considered hazardous waste. Ms. Valdez makes hazardous waste determinations for all waste consumer commodities based on product knowledge. Hazardous waste consumer commodities are typically considered to be D001, D002, and/or other hazardous waste codes as applicable. The monthly generation rate varies significantly. The waste is collected by Clean Harbors Environmental Services (Clean Harbors) and transported to Clean Harbors in LaPorte, Texas, or Spring Grove Resource Recovery in Cincinnati, Ohio, for incineration or bulking and transfer to another site. Hazardous waste consumer commodities were most recently collected on September 26, 2024.

I asked Ms. Valdez how the hazardous waste determinations are made. She explained that waste profiles have been established based on product knowledge (for example, information from the

SDS or discussions with Clean Harbors personnel). Ms. Valdez maintains waste profile information and other related information (such as example container labels for each waste stream) in a binder at the HWCAA. I reviewed the binder during the CEI and noted no concerns with the profiled waste streams. Ms. Valdez stated that all damaged consumer products are sent to the HWCAA where all of the hazardous waste determinations are made. Hazardous waste consumer commodities are accumulated in the HWCAA upon generation.

During the CEI, I observed fifteen 55-gallon containers of hazardous waste consumer commodities in the HWCAA. The containers did not meet the definition of satellite accumulation container because more than 55 gallons of hazardous waste were being accumulated in a single area; therefore, I inspected the containers as hazardous waste accumulation containers (HWACs). All HWACs were structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard. Twelve of the HWACs were marked with accumulation start dates, and the oldest date was July 24, 2024 (Attachment 7, Photographs 1 and 2). The other three HWACs were not marked with accumulation start dates (Attachment 7, Photographs 3 through 8). I determined that the facility failed to mark three HWACs with accumulation start dates, as required by 40 CFR 262.17(a)(5)(i)(C) (**NOPF No. 1**).

I asked Ms. Valdez how long the three HWACs had been accumulating waste. She stated that all of the HWACs were listed on her inventory on her computer. She looked up the inventory and reported that the oldest HWAC had been accumulating waste since October 4, 2024. I provided compliance assistance regarding labeling of HWACs during the CEI.

Nonhazardous waste consumer commodities include damaged consumer products that are considered nonhazardous waste based on product knowledge. A generation rate was not determined during the CEI, as quantities generated and shipped off site vary significantly from month to month. However, the rate is much higher than the generation rate for hazardous waste consumer commodities. The waste is collected by Clean Harbors and transported to Clean Harbors in LaPorte, Texas. Nonhazardous waste consumer commodities were most recently collected on January 11, 2024. Generation of damaged goods is unpredictable, and Amazon has procedures to minimize waste. Nonhazardous waste consumer commodities are sorted and containerized in the HWCAA and then accumulated on warehouse shelving. I did not observe nonhazardous waste consumer commodities in the HWCAA at the time of the CEI, and did not inspect nonhazardous waste consumer commodities on warehouse shelving during the CEI.

Used oil is generated during routine maintenance of facility machinery. The facility manages used oil according to requirements of 40 CFR Part 279. Approximately 55 gallons of used oil are generated each year. The facility accumulates used oil in a 55-gallon used oil storage container in the HWCAA. Used oil is collected by Clean Harbors and transported to Clean Harbors in Kimball, Nebraska, for recycling.

During the CEI, I observed the 55-gallon used oil storage container in the HWCAA (Attachment 7, Photograph 10). The used oil storage container appeared to be in good shape without any apparent leaks or damage, was labeled with the words “used oil,” and held approximately 15 gallons of used oil. I noted no deficiencies with accumulation of used oil during the CEI.

Waste batteries primarily consist of waste consumer commodities that are unused. However, the waste stream may also include waste batteries generated at the facility during equipment maintenance. The facility manages all waste batteries as universal waste according to requirements of 40 CFR Part 273. Waste batteries are accumulated in universal waste accumulation containers in the HWCAA. The generation rate varies significantly and was not determined during the CEI. Waste batteries are collected by Clean Harbors and transported to Clean Harbors in Kimball, Nebraska, for recycling.

During the CEI, I observed one universal waste batteries accumulation container in the HWCAA (Attachment 7, Photograph 11). The 55-gallon container was labeled with the words “universal waste batteries,” held approximately 1 gallon of waste batteries, and was dated August 6, 2024. I noted no deficiencies with accumulation of waste batteries during the CEI.

Used lamps primarily consist of waste consumer commodities that are unused. However, the waste stream may also include used LED lamps generated during facility equipment maintenance. The facility manages all used lamps as universal waste according to requirements of 40 CFR Part 273. Used lamps are accumulated in universal waste accumulation containers in the HWCAA. The generation rate varies significantly and was not determined during the CEI. Used lamps are collected by Clean Harbors and transported to Clean Harbors in Kimball, Nebraska, for recycling.

During the CEI I observed one universal waste lamps accumulation container in the HWCAA (Attachment 7, Photograph 12). The container was structurally sound, closed, labeled with the words “universal waste lamps,” held approximately 15 four-foot used lamps, and was marked with an accumulation start date of September 9, 2024. I noted no deficiencies with accumulation of used lamps during the CEI.

Waste aerosol cans primarily consist of aerosol cans generated at the facility during equipment or facility maintenance. The facility manages all waste aerosol cans as universal waste according to requirements of 40 CFR Part 273. Waste aerosol cans are accumulated in universal waste accumulation containers in the HWCAA. The generation rate varies significantly and was not determined during the CEI. Waste aerosol cans are collected by Clean Harbors and transported to Clean Harbors in Kimball, Nebraska, for recycling.

During the CEI, I observed one universal waste aerosol cans accumulation container in the HWCAA (Attachment 7, Photograph 9). The container was structurally sound, closed, labeled with the words “universal waste aerosol cans,” and held approximately 10 gallons of waste. The container was marked with an accumulation start date of September 25, 2024. I noted no deficiencies with the accumulation of UWA during the CEI.

General trash consists of office-type refuse, such as waste packaging materials and food containers. Waste consumer commodities are not considered general trash. The facility has determined that general trash is nonhazardous based on product knowledge. General trash is accumulated in several containers throughout the facility and transferred to a 4-cubic-yard roll-off container or compactor. General trash is collected by Republic Services and transported to

the Scott County Landfill for disposal. I observed accumulation of general trash during the CEI and noted no deficiencies.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment consisting of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Areas

Amazon maintains one HWCAA in the shipping area. During the CEI, I observed 15 HWACs in the HWCAA. The HWCAA was maintained with adequate aisle space. I asked Ms. Valdez if inspections are performed and how often. She stated that she conducts inspections on a weekly basis and that she maintains an inspection log. I reviewed the inspection logs for the previous year and noted no missed inspections. A copy of the latest inspection log, dated October 10, 2024, is in Attachment 8. I noted that page 1 of the October 10, 2024, inspection log states that all of the HWACs are labeled correctly and dated. Since three HWACs were observed without accumulation start dates during the CEI, I determined the facility failed to conduct adequate weekly inspections, as required by 40 CFR 262.17(a)(1)(v) (**NOPF No. 5**).

NOPF No. 5 was not left initially at the facility but was added on October 16, 2024. Mr. Barry was notified by email on October 16, 2024.

I asked Ms. Valdez how a worker would summon emergency assistance. She stated that all of the workers who handled hazardous waste carry a two-way radio. In addition, a telephone is present in the HWCAA.

6. Manifests and Biennial Report

Amazon generated manifests for 20 hazardous waste shipments from October 14, 2023 to October 14, 2024. Most of the containers shipped were not full containers. During the CEI, I reviewed manifests and LDR notifications for all 20 shipments. Copies of the manifests and LDRs for hazardous wastes shipments dated September 11, 19, and 20, 2024, are included in Attachment 9 as examples. The facility submitted a 2023 Hazardous Waste Biennial Report on February 18, 2024. I noted no deficiencies during my review of manifests and the biennial report.

7. Preparedness and Prevention Plan

LQG facilities are required by 40 CFR 262.17(a) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Mr. Lyron, Amazon is the subject of a regular inspection by the Davenport Fire Department hazardous materials team. During those inspections, he said the fire department is shown the layout of the facility, the location of the HWCAA, and other facility

features. I asked Mr. Lyron who is the emergency coordinator for the facility. He stated that the previous emergency coordinator (Mr. John Furnice) left the facility in June 2024, and that nobody had been appointed to that position. I determined that the facility failed to designate an emergency coordinator, as required by 40 CFR 262.17(a)(6) referencing 262.264 (**NOFF No. 2**).

During the CEI I asked Mr. Lyron if the facility has a contingency plan. He stated that he had created a template for Mr. Furnice before he left and he did not know if Mr. Furnice had filled it out and submitted it. Mr. Lyron retrieved the contingency plan, which is included as Attachment 10 (CBI). Based on the draft contingency plan template provided by Mr. Lyron, the facility did not complete the template or submit the document to response agencies. Specifically, it appeared that the facility:

- Failed to make arrangements with local emergency agencies, as required by 40 CFR 262.17(a)(6) referencing 262.256(a)
- Failed to maintain records documenting arrangements with response agencies, as required by 40 CFR 262.17(a)(6) referencing 262.256(b)
- Failed to submit the contingency plan to emergency response agencies, as required by 40 CFR 262.17(a)(6) referencing 262.262(a)
- Failed to review and amend the contingency plan when the emergency coordinator changes, as required by 40 CFR 262.17(a)(6) referencing 262.263(d)
- Failed to identify emergency coordinator(s) by name and telephone number in the contingency plan, as required by 40 CFR 262.17(a)(6) referencing 262.261(d)

Each of these is included as part of a preliminary finding for failure to maintain an adequate contingency plan, as required by 40 CFR 262.17(a)(6) referencing 262.260(a) (**NOFF No. 3**).

I asked Mr. Lyron if the facility has a Quick Reference Guide. He stated that the facility did not have a Quick Reference Guide. I determined that the facility failed to prepare and submit a Quick Reference Guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b)(1) through (b)(8) (**NOFF No. 4**).

I provided compliance assistance regarding requirements for preparation, amendment, and submittal of the RCRA contingency plan and Quick Reference Guide during the CEI.

8. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7)(i)(A) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. Amazon provides annual training to personnel who handle and manage hazardous waste. Copies of the 2024 training records for Ms. Valdez are in Attachment 11 as examples.

I reviewed the written job descriptions for personnel who handle hazardous waste and noted that the documentation appeared to be adequate. A copy of the facility's training plan, which identifies duties and training plans for different job titles, is in Attachment 12. The training for the emergency coordinator is listed on row 11 of this plan.

9. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards specified in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Amazon is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Amazon is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable because the facility accumulates hazardous waste that contains VOCs in 55-gallon HWACs. During the CEI, I determined that Amazon meets the Subpart CC requirements for containers by using Container Level 1 controls (HWACs smaller than 122 gallons that are Department of Transportation [DOT]-approved). I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

10. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

- (1) Failure to mark three HWACs with accumulation start dates, as required by 40 CFR 262.17(a)(5)(i)(C) (**NOPF No. 1**)
- (2) Failure to designate an emergency coordinator, as required by 40 CFR 262.17(a)(6) referencing 262.264 (**NOPF No. 2**)
- (3) Failure to maintain an adequate contingency plan, as required by 40 CFR 262.17(a)(6) referencing 262.260(a) (**NOPF No. 3**)
- (4) Failure to prepare and submit a Quick Reference Guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b)(1) through (b)(8) (**NOPF No. 4**)
- (5) Failure to conduct adequate weekly inspections, as required by 40 CFR 262.17(a)(1)(v) (**NOPF No. 5**)

NOPF No. 5 was not left initially at the facility but was added on October 16, 2024. Mr. Barry was notified by email on October 16, 2024.

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

Clifford A.
Nelles

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Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

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Amber Whisnant, Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments:

1. Notification Acknowledgment/Verification Report (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Aerial Photograph (1 page)
7. Photographic Documentation (Photolog and 12 Photographs) (8 pages)
8. Copy of Weekly Inspection Log Dated October 10, 2024 (3 pages)
9. Copy of Manifests and LDR for shipments on September 11, 19, and 20, 2024 (8 pages)
10. RCRA Contingency Plan (7 pages) (CBI)
11. Copies of 2024 Training Records for Cristal Valdez (3 pages)
12. Copy of Training Plan (2 pages)