

*Resource Conservation and Recovery Act (RCRA)*  
 Compliance Evaluation Inspection

Facility Name:	Dana Transport		
EPA ID Number:	PRR000018259		
Date of Inspection:	January 23, 2025		
Generator Status in Record:	LQG		
Generator Status at the time of inspection:	LQG		
RCRA Permitted:	No		
Basis for Inspection:	Core Program		
Corrective Action:	No		
Project ID	CEPD-RCRA-09-0141		
Facility Physical Location: (Municipality, PR, zip code)	{10203 Industry Drive}		
Geographical Coordinates:	18.417629, -66.1401		
Facility Owner:	Ronald Dana	732-750-9100	
	rondana@danacompanies.com		
	Mailing address: 210 Essex Ave. East, Avenel, NJ. 07001		
Facility Operator:	Alberto Grau	787-642-8968	
	agrau@danacompanies.com		
	Mailing address: 195 Industrial Luchetti, carretera 5 Industrial Luchetti , PR 00961-7420		
NAICS:	562998	SIC:	
Area:			
Number Employees:	30		
Personnel participating in inspection:			
<b>Inspector's Name</b>	<b>Affiliation</b>	<b>Title</b>	<b>{phone/email}</b>
Khrystian M Vazquez	EPA Region 2-CEPD	RCRA Inspector	787-977-5860
Rogelio Hernandez	Dana Transport	Field Supervisor	rhernandez@danacompanies.com
David P Lacavera	Dana Transport	Assnt. Env. Manager	dlacavera@danacompanies.com
Status:	<b>FINAL</b>		
Record Schedule:	1044(c) {unless landmark or precedent}		
Multi-media Checklist: ATTACHMENT #3	Referral: CWA		
EPA Lead Inspector Signature/Date	×  2025/04/01		
Supervisor Signature/Date	X <b>DAVID CUEVAS MIRANDA</b> <div style="border: 1px solid black; padding: 2px; display: inline-block; font-size: small;">                     Digitally signed by DAVID CUEVAS-MIRANDA                      Date: 2025.04.01 14:51:42 -04'00'                 </div> David N. Cuevas Miranda, Ph.D.		

## 1 INTRODUCTION

On January 23, 2025, a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection was conducted at Dana Transport (the Facility), pursuant to Section 3007 of RCRA. As part of the Inspection, an opening meeting, walkthrough, documents review and closing meeting were conducted to evaluate Facility's compliance with the requirements that govern hazardous waste generators, universal waste handlers and used oil generators, as applicable.

The Facility is located at 195 Industrial Luchetti, carretera 5 Industrial Luchetti , PR 00961-7420. Refer to *Figure 1* for the location and to *Figure 2* for an aerial photograph of the Facility, **ATTACHMENT I**.

According to EPA records, the Facility has been inspected four times from 2009 to 2020. EPA has inspected the facility three times and the State once in 2012. During the last EPA inspection in 2020 the Facility were found to have seven violations. Violations reported were related to waste determination, open containers, containers conditions, labeling, preparedness and management of Universal Waste.

## 2 OPENING MEETING

I arrived at the facility at 10:40 hours and initially spoke to Ms. Carmen Echevarria. Ms. Echevarria is the Driver Dispatcher of the Facility. Ms. Echevarria introduced me to Mr. Rogelio Hernandez. He is the Dana Transport Field Supervisor. Mr. Hernandez has work for the Facility for twenty-seven (27) years and has held the Field Supervisor position since 2020.

I identified myself as EPA RCRA enforcement officer and told Mr. Hernandez that the purpose of my visit was to conduct a CEI at the facility to evaluate its hazardous waste management practices and compliance. Mr. Hernandez was familiarized with the CEI process and explained that the Assistant Environmental Manager of the Facility is Mr. David P Lacavera. During the CEI Mr. Lacavera was not able to participate. For the purpose of the CEI, Mr. Hernandez was the person in charge.

### 2.1 FACILITY PHYSICAL DESCRIPTION AND OPERATION

Dana Transport is a transportation company under International Equipment Logistics (IEL) INC., that provides hazardous material transportation services throughout the island of Puerto Rico. The Facility started operations in 1988 and since then they have operated in the same location. By 2002, they started a tank wash operation, where they clean customers trucks tanks that were already used for fuel transportations. The Facility operates a truck tractor fleet for its services, therefore handles, stores and uses petroleum products in the form of diesel. IEL receives diesel fuel by common carrier via tank bus. Diesel is stored in an above ground storage tank with a capacity of 2,500 gallons.

The facility operates with approximately thirty (30) employees from Monday-Friday from 0600 hours-1700 hours. They may work on Saturday upon request. The employees' workload is segregated as follow: nine (9) truck drivers, five (5) administrative, two (2) contractors for Human Resources, four (4) at the truck tank washer, two (2) mechanics, one (1) Wastewater Treatment Plant and seven (7) maintenance employees.

## 2.2 SOLID AND HAZARDOUS WASTE GENERATION

According to EPA data base in RCRA Info the Facility generates the following waste codes: D001 (Ignitable), D002 (Corrosive), U002 (Acetone), U154 (Methanol), U239 (Xylene). I asked Mr. Hernandez where the Facility hazardous waste is generated, and he explained that is mostly from the residues of the tank washer operation and the WWTP.

According to Mr. Hernandez, Safety Kleen is the hauler used for the disposal of hazardous waste, and the frequency can range from one to three months. Interstate Battery is the hauler to manage used batteries. Oil Energy System is the company for the management of used oil, and IFCO Recycling is used for scrap metal.

I asked Mr. Hernandez if there is a significant change of the areas inspected from the last CEI and he replied that the Junker Area was eliminated after the last inspection.

## 3 FACILITY WALKTHROUGH

Mr. Hernandez accompanied me during the facility walkthrough. During the facility walkthrough the following areas were inspected:

- Used Oil Recycled Area
- The Warehouse
- The Tools & Parts Equipment Area
- Hazardous Waste Storage Area
- WWTP
- The Tank Washer

The observations for each area are described below. Refer to Attachment 1 for pictures taken during the inspection.

### 3.1 USED OIL RECYCLED AREA

The area is located outside the Tools and Parts area and is identified as Recycle Area. Four (4) 55gallon blue plastic containers were on top of a wood pallet. The first two containers had pads impregnated with oil. The third container had one empty bottle of SW-30 motor oil, and the last (fourth) container had one empty spray of Harris Engine Enamel.

**These containers had a recycle label, but none of them had a Used Oil or Universal Waste Label.**

Reference:

- 40 CFR 279.22(c)(1) Labels- Subpart C – Standards for Large Quantity Handlers of Universal Waste
- 40 CFR 279.22(c)(1) Labels- Subpart C – Standards for Used Oil Generators

*\*See Attachment 2- Pictures from 0001-0010*

### 3.2 TOOLS & PARTS EQUIPMENT AREA

The Tools & Parts Equipment Area is a storage room that stores mechanical tools. Inside is equipped with shelves for equipment storage and a Spill Kit container. Here I observed that there was a part washer, and it was empty and clean.

*\*See Attachment 2- Pictures from 0011-0014*

**\*No concerns were observed in this area\***

Outside the Tools and Part Area, I observed numerous trucks to be decommission but the Facility states that they also have them because its mechanical parts can be used to fix other trucks.

### 3.3 HAZARDOUS WASTE STORAGE AREA

The HWSA is a pad locked cyclone fenced square, built over a small dike with a ramp in the front and a poorly<sup>1</sup> constructed aluminum roof. Outside and on the left side of the HWSA there is a fire extinguisher with its certification up to date, but there was no **“NO SMOKE”** sign observed (*Reference: General (40 CFR § 262 Subpart A)*). The fence gate had a sign that read **“CAUTION HAZARDOUS WASTE STORAGE AREA”**. On the top left corner was the fire alarm. **In addition, the HWSA did not have a water system at adequate volume and pressure to supply water hose stream, or foam in an emergency event** (*Reference: 40 CFR § 262 SUBPART M*). The right side of the HWSA had a sign, without a **dated emergency name and locations** of the Fire Department, Police, Hospitals, National Response Center and EQB (now Department of Environmental and Natural Resources).

**At the time of the inspection the control valve that regulates spills to the outside at the dike around the HWSA was found to be broken.**

*Reference:*

- 40 CFR § 262 SUBPART M § 262.251 -Maintenance and operation of facility

Inside the HWSA I observed the following:

- One-55 gallon blue plastic container with waste hazardous liquid with sodium hydroxide dated 1/17/25 with the appropriate label and pictogram.
- One-55 gallon blue plastic container with waste hazardous liquid with sodium hydroxide dated 1/23/25 with the appropriate label and pictogram.
- One-55 gallon black plastic container with waste hazardous liquid with sodium hydroxide dated 12/06/24 with the appropriate label and pictogram.

---

<sup>1</sup> Layers of aluminum sheets one on top of the other that are not attached.

- Six-55 gallon blue plastic container with caustic sludge all dated 12/06/24 with the appropriate label and pictogram. **The lid from this container was cracked.**

*Reference:*

- 40 CFR § 262 Subpart A §262.17(a)(1)(ii)-Condition of Containers

**During the observation of this area, I told Mr. Hernandez that aisle space was not observed and the importance of such practice.**

*Reference:*

- 40 CFR § 262 SUBPART M §262.255-Required aisle space

*\*See Attachment 2- Pictures from 0022-0061*

### **3.4 WASTE WATER TREATMENT PLANT & TANK WASHER AREA**

This area consists of an open building that has concrete floor, two (2) washing stations and the WWTP. This concrete floor has drains that collect wash waters and directs them to the WWTP<sup>2</sup> to be treated prior to be discharged to PRASA<sup>3</sup>.

Next to the WWTP I observed two Steel Pallets IBC tanks with a Non-Hazardous waste label. **The two tanks had effluent residues inside, but one of the tanks had a top broken opening space uncovered.** None of the tanks were in use at the time of the inspection. I asked Mr. Hernandez why there was no cover on the tanks and according to him is not mandatory to have the opening covered when not in used.

On the side wall I also observed: Five (5) 55-gallon blue containers labeled non-hazardous waste caustic sodium. According to Mr. Hernandez, the labels were to identify the content but not waste, it was material to be use. I explained Mr. Hernandez that wrongfully labeling container can cause misunderstanding and mismanagement in an emergency. Mr. Hernandez immediately proceeded to take away the labels of all five containers.

Another observation made during the inspection was that the WWTP has several joints leaking all the time. This observation was documented on the Multimedia checklist<sup>4</sup> and referred to the appropriate EPA Branch.

*See Attachment 2- Pictures from 0064-0090*

---

<sup>2</sup> This WWTP treat the wash water generated at the wash stations and were collected at the drain located at the concrete floor. Then, the latter is transferred to an influent tank. After this, the waste water is treated at the WWTP and then transferred to an effluent tank that discharges via Waste Water (WW) sample point 001.

<sup>3</sup> Description taken from previous report March 04, 2020

<sup>4</sup> See Attachment III

### **3.5 OUTSIDE AREAS**

Outside the WWPT and Tank Washer, the facility has a 15-yard dumpster for Scrap Metal.

*\*See Attachment 2- Pictures from #91-#93*

The facility perimeter goes beyond its own fence where unused tanks are dumped waiting to be decommissioned.

*\*See Attachment 2- Pictures from #95-#99 and #100-#101*

I walked the outside east perimeter of the facility and found a well, covered with vegetation and the sign to identify the well was covered with mud. Mr. Hernandez proceeded to clean the sign and put it back on.

*\*See Attachment 2- Pictures from #101-#106*

On the west side of the Facility there is a waiting station for trucks. In this area I observed, another diesel dike where a check valve was broken and needed to be fixed. During the inspection Mr. Hernandez took immediate action to fix the valve (Picture #105).

I also observed an oil tramp where the top lid did not cover the entire opening leaving it partially open.

*\*See Attachment 2- Pictures #107*

## **4 DOCUMENTS REVIEW**

I reviewed the requested documents after the facility walkthrough. Mr. Hernandez along with the HR personnel, Ms. Keishla Rosario and Ms. Natalia Mudafort helped provide the regulated requested documentation and stayed with me to answer any questions.

### **4.1 SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN (SPCC)**

The SPCC included all the regulated areas for compliance, and it was updated as August 2024.

### **4.2 TRAINING REQUIREMENTS**

- Mr. Rogelio Hernandez
  - 8 hours Hazardous Waste Site Worker Training  
Date: February 27, 2016
  - NFPA-ASSE by EM Diaz Consultant Inc  
Date: September 25, 2023
  - OSHA Hazardous Waste RCRA Basic (Spanish)

Date; January 27.2024

- Hazardous of Nitrogen Asphyxiation  
Date: September 25, 2023

➤ David Lacavera

- Hazard Communication  
Date: June 06, 2024
- Hazmat Awareness  
Date: June 06, 2024
- OSHA Hazardous Waste RCRA Basic  
Date: June 06, 2024

### 4.3 JOB DESCRIPTION

- Davis Lacavera- Date: 6/24/2020  
Job Description includes specific term describing hazardous waste management
- **Rogelio Hernandez- was not available at the time of the CEI**

Reference:

- General- 40 CFR § 262 Subpart A §262.17(a)(7)(iv)-Personnel training

### 4.4 CONTINGENCY PLAN

- **During the evaluation of the Contingency Plan Mr. Hernandez could not provide evidence of emergency agencies notification and delivered copies**

Reference:

- 40 CFR § 262 SUBPART M §262.261(c) (§262.262(a)(b))- Content of contingency plan

- **The Contingency plan also lacked the description of the Hazardous Wastes and management provision to respond in an emergency.**

Reference

- 40 CFR § 262 SUBPART M §262.261(b)- Copies of contingency plan

- **Also, the Appendix of the Contingency plan with all emergency numbers and contact information was outdated.**

Reference

- 40 CFR § 262 SUBPART M §262.261(c) Content of contingency plan

## 4.5 HAZARDOUS WASTE MANIFEST

### 2022

Manifest # 024071578 JJK dated 9/7/2022

Manifest #024071636 JJK dated 11/14/2022 -**certification of receipt signature missing**

Manifest #024071655 JJK dated: 02/14/2022 -**LDR missing**

### 2023

Manifest #008905448 dated: 12/21/2023

Manifest #008792759 SKS dated: 8/8/2023

Manifest #024071872 JJK dated: 5/18/2023

Manifest #024071845 JJK dated: 3/15/2023

Manifest #024071820 JJK dated 3/20/2023

Manifest #008905415 SKS dated: 11/30/2023

**\*No concern observed\***

### 2024

Manifest #009197851 SKS dated: 9/10/2024

Manifest #009495662 SKS dated; 2/4/2024

Manifest #008905350 SKS dated: 1/31/2024

Manifest #009083336 SKS dated: 4/26/2024

Manifest # 009495662 SKS dated: 12/04/2024 **certification of receipt signature missing**

Manifest # 009197851 SKS dated 9/10/2024 **certification of receipt signature missing**

### Reference:

- **Manifest Requirements** 40 CFR § 262 Subpart B §262.20(a)(1)- Paper manifest
- **General** (40 CFR § 262 Subpart A) §262.17(a)(9)- Land disposal restrictions

#### 4.6 USED OIL MANIFEST

Manifest #143275 dated: 12/07/2022

Manifest # 140 205 dated: 4/4/2022

Manifest #134977 dated 22/10/2021

Manifest #152866 dated 8/6/2023

Manifest #109846 dated 5/1/2024

**\*No concerns observed\***

#### 4.7 NON-HAZARDOUS WASTE MANIFEST

**\*No concern observed\***

#### 4.8 WEEKLY LOG

Mr. Hernandez provided the Facility Daily Inspection log. **I observed that the inspection checklist provides a statement for the check valve, and it was marked as in good condition when in fact, was broken.** I explained the importance of having and inspecting the checklist according to the log description in order to provide a more assertive status of the Facility areas.

##### Reference:

- General 40 CFR § 262 Subpart A §262.17(a)(1)(v)-Inspections

#### 4.9 BIENNIAL REPORT

Biennial report was reviewed on the RCRAInfo Data System and facility submitted EPA Form 8700-13 A/B on 04/09/24, after the March 1<sup>st</sup>, 2024, deadline.

##### Reference:

- Recordkeeping and Reporting Applicable to Small and Large Quantity Generators 40 CFR §262 Subpart D § 262.41(a)-Biennial report for large quantity generators

#### 4.10 HAZARDOUS WASTE MINIMIZATION PLAN

**Not available at the time of the CEI**

##### Reference:

- Manifest Requirements 40 CFR §262 Subpart B -Waste Minimization Plan §262.27(a)

## 5 CLOSING MEETING

After completion of the walkthrough and document review, I met with Mr. Hernandez to conduct a closing meeting. I indicated that the purpose of the closing meeting was to inform the facility about the CEI observations. I communicated Mr. Hernandez the following:

## 6 POTENTIAL AREAS OF CONCERN

### 6.1 GENERATORS

On April 09, 2024, the Facility notified of its hazardous waste activities as large quantity generator. During the inspection, I confirmed Facility's generator status by verifying its disposal events as described in the manifests and/or the quantity of hazardous waste that was being accumulated onsite (i.e. over 1,000 or 6,000 kg). Based on the observations and information gathered during the inspection, the following areas of concern were identified:

#### 6.1.1 General (40 CFR § 262 Subpart A)

##### **§ 262.17 Conditions for exemption for a large quantity generator that accumulates hazardous waste.**

40 CFR 262.17(a)(1)(ii)

##### **Condition of Containers**

If a container holding hazardous waste is not in good condition, or if it begins to leak, the large quantity generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section.

**At the time of the inspection the lid from one of the HWSA containers was observed cracked.**

40 CFR 262.17(a)(1)(v)

##### **Inspections**

At least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See paragraph (a)(1)(ii) of this section for remedial action required if deterioration or leaks are detected.

**During the review of the Weekly Inspection Log I observed that the inspection checklist provides a statement for the check valve, and it was marked as in good condition for the recent days, when in fact, was broken.**

40 CFR 262.17(a)(1)(vi)(B)

##### **Special conditions for accumulation of ignitable and reactive wastes**

While ignitable or reactive waste is being handled, the large quantity generator must confine smoking and open flame to specially designated locations. **“No Smoking”** signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

**At the time of the Inspection the “No Smoke” sign was not observed in the HWSA.**

40 CFR 262.17(a)(7)(iv)

**Personnel training**

The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

**Mr. Rogelio Hernandez, the Facility field supervisor Job Description was not available at the time of the CEI**

40 CFR 262.17(a)(9)

**Land disposal restrictions**

The large quantity generator complies with all applicable requirements under 40 CFR part 268. 40 CFR 268.7(a)(8) Generators must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this section for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The three-year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator.

**During the review of the Hazardous Waste Manifest I noticed that the LDR certification receipt was missing on the February 2022 manifest.**

**6.1.2 Manifest Requirements (40 CFR § 262 Subpart B)**

40 CFR §262.20(a)(1)

**Paper manifest**

A generator that transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, or a treatment, storage, or disposal facility that offers for transport a rejected hazardous waste load, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A. Large and small quantity generators must register with the EPA's e-Manifest system to obtain signed and dated copies of completed manifests from the EPA e-Manifest system and comply with paragraph (a)(2) of this section.

**During the review of the Hazardous Waste Manifest the certification of receipt signature was missing from the following manifests: November 2022, September and December 2024.**

40 CFR §262.27(a)

**Waste minimization certification**

“I am a large quantity generator. I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable, and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;”

The Hazardous waste minimization was not available during the Documents Review

**6.1.3 Recordkeeping and Reporting Applicable to Small and Large Quantity Generators (40 CFR § 262 Subpart D)**

40 CFR § 262.41(a)

**Biennial report for large quantity generators**

A generator who is a large quantity generator for at least one month of an odd-numbered year (reporting year) who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must complete and submit EPA Form 8700-13 A/B to the Regional Administrator by March 1 of the following even-numbered year and must cover generator activities during the previous year.

**During the documents review I observed that the Biennial Report Form 8700-13 A/B was submitted EPA on 04/09/24. The EPA deadline was on March 1<sup>st</sup> 2024**

**6.1.4 Preparedness, Prevention, and Emergency Procedures for Large Quantity Generators (40 CFR § 262 SUBPART M)**

40 CFR § 262.251

**Maintenance and operation of facility**

A large quantity generator 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.

**At the time of the inspection the valve that controls spill to the outside of the dike surrounding the HWSA was found to be broken.**

40 CFR § 262.252

**Required equipment**

(d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

**At the time of the inspection the HWSA did not have a water system at adequate volume and pressure to supply water hose stream, or foam in an emergency event.**

40 CFR § 262.255

**Required aisle space**

The large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

**During the observation of the HWSA, aisle space was not observed in between containers.**

40 CFR § 262.261

**Content of contingency plan**

(b) If the generator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with part 112 of this chapter, or some other emergency or contingency plan, it need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the standards of this part.

(c) The plan must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee, pursuant to § 262.256.

(d) The plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see § 262.264), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator, and others must be listed in the order in which they will assume responsibility as alternates. In situations where the generator facility has an emergency coordinator continuously on duty because it operates 24 hours per day, every day of the year, the plan may list the staffed position (e.g., operations manager, shift coordinator, shift operations supervisor) as well as an emergency telephone number that can be guaranteed to be answered at all times.

**During the evaluation of the Contingency Plan Mr. Hernandez could not provide evidence of emergency agencies notification.**

**The Contingency Plan also lacked the description of the Hazardous Wastes management provisions on the Facility.**

40 CFR § 262.262

**Copies of contingency plan**

(a) The large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

(b) A large quantity generator that first becomes subject to these provisions after May 30, 2017, or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

**During the evaluation of the Contingency Plan Mr. Hernandez could not provide evidence of emergency agencies notification and delivered copies**

## **6.2 UNIVERSAL WASTE (40 C.F.R. § 273)**

### **6.2.1 [Subpart C – Standards for Large Quantity Handlers Of Universal Waste](#)**

40 CFR 273.34(f) Labeling and Marking

Universal waste aerosol cans (*i.e.*, each aerosol can), or a container in which the aerosol cans are contained, must be labeled or marked clearly with any of the following phrases: “Universal Waste—Aerosol Can(s)”, “Waste Aerosol Can(s)”, or “Used Aerosol Can(s)”.

**At the time of the Inspection containers at the Used Oil Recycled Area had a recycle label, but none of them had a Used Oil or Universal Waste or Universal Waste Label.**

## **6.3 USED OIL (40 C.F.R. § 279)**

### **6.3.1 [Subpart C – Standards for Used Oil Generators](#)**

40 CFR 279.22(c)(1) Labels

Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

**At the time of the Inspection containers at the Used Oil Recycled Area had a recycle label, but none of them had a Used Oil or Universal Waste or Universal Waste Label.**

## **7 FOLLOW-UP ACTIONS**

The facility staff agreed to email the missing documents at a later time.

## **8 ATTACHMENTS**

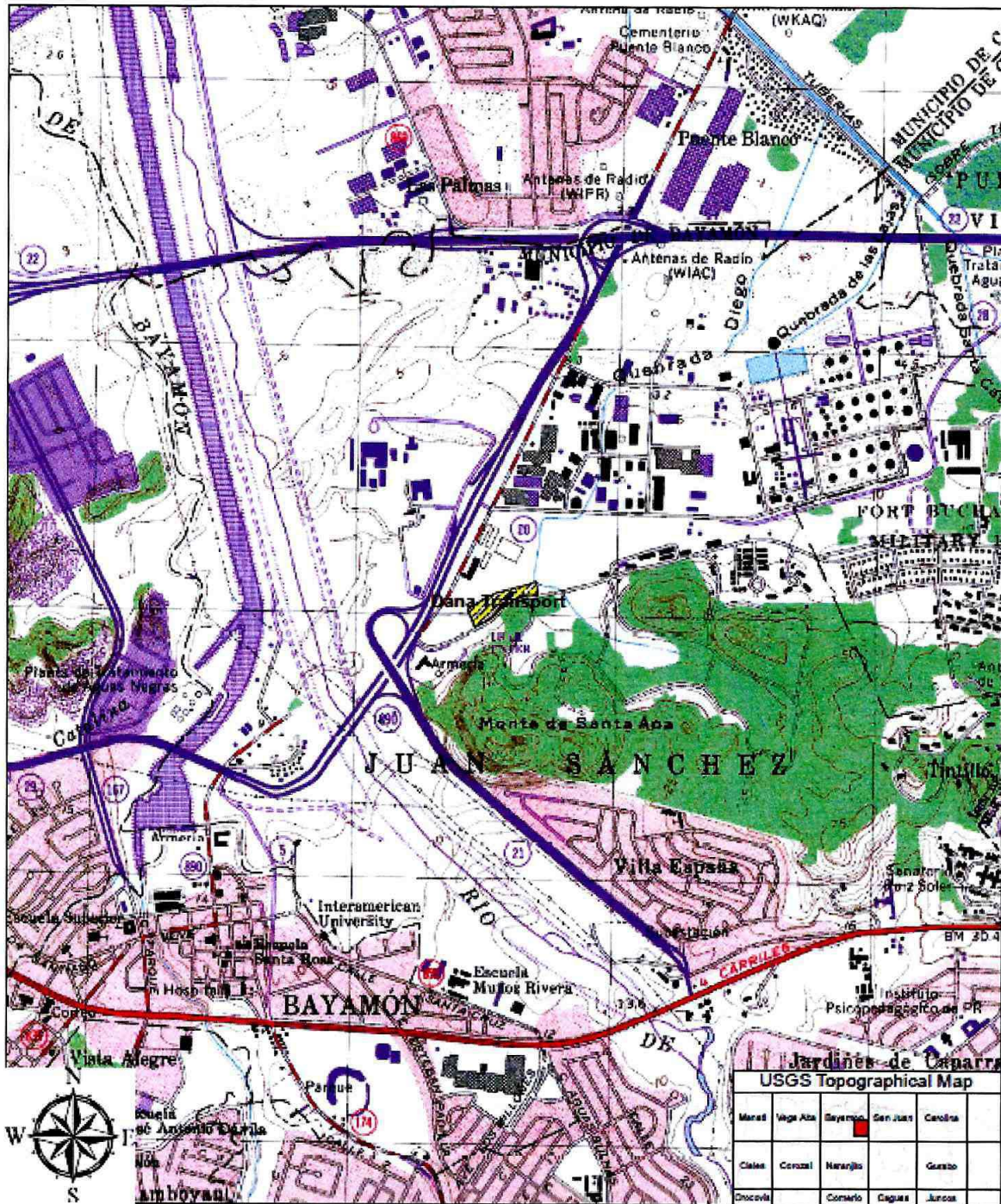
- I. Figure 1- Facility Location Map and Figure -2 Aerial Photograph
- II. Photolog and Camera Roll (include all pictures taken in addition to photolog)
- III. Multi-media Checklist

# Attachment I

Resource Conservation and Recovery Act

Dana Transport

PRR00018259



USGS Topographical Map

Manatí	Vega Alta	Bayamon	San Juan	Carolina
Ciales	Corozal	Naranjo		Guayama
Dorado		Comerio	Caguas	Juncos



Title: Figure 1: Dana Transport, Bayamon, Puerto Rico

EPA ID: PRR00018259

Project: CEPD-RCRA-09-0141



Title:

Figure 2: Dana Transport, Bayamon, Puerto Rico - Aerial Photo

EPA ID:

PRR000018259

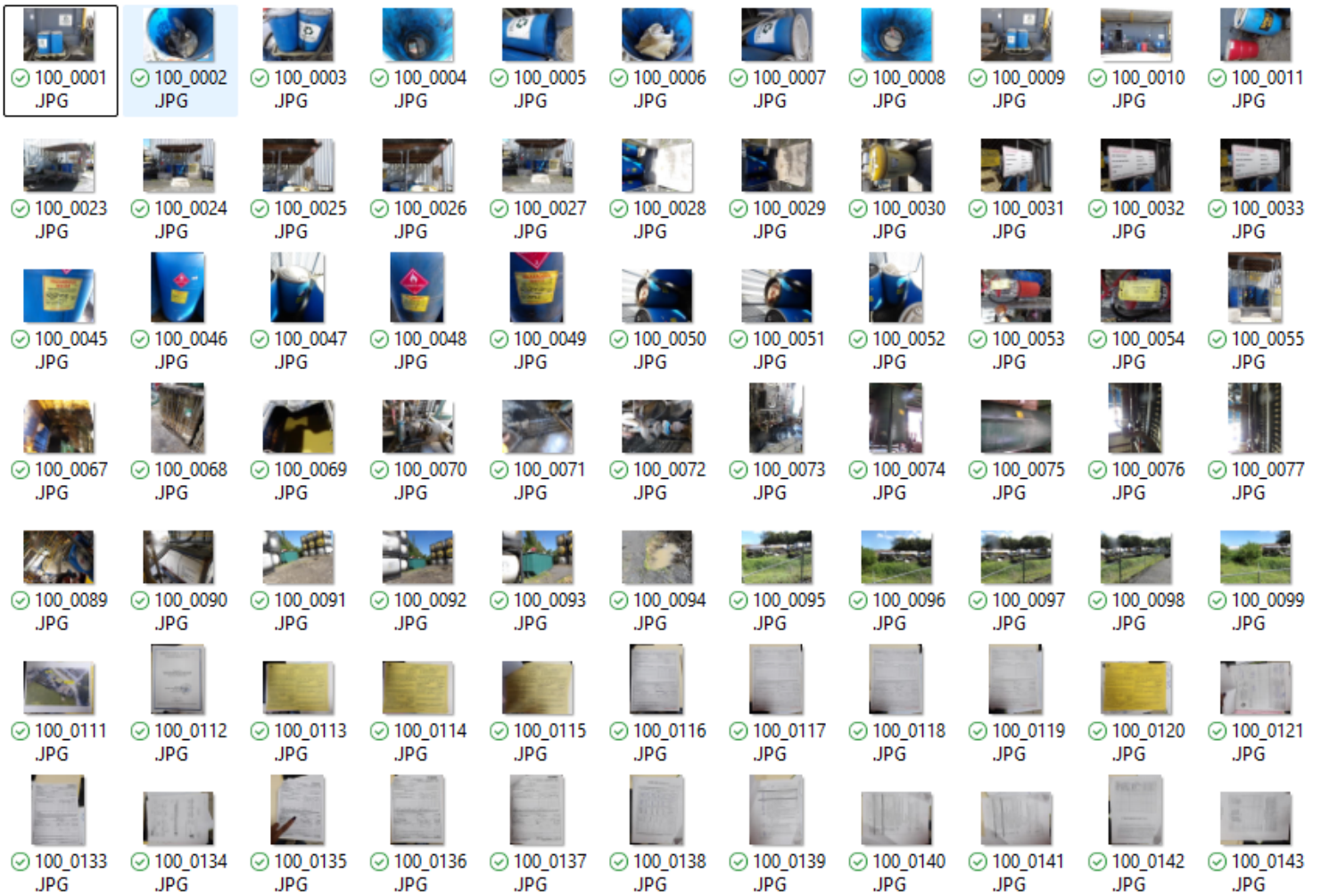
Project:

CEPD-RCRA-09-0141

# Attachment II

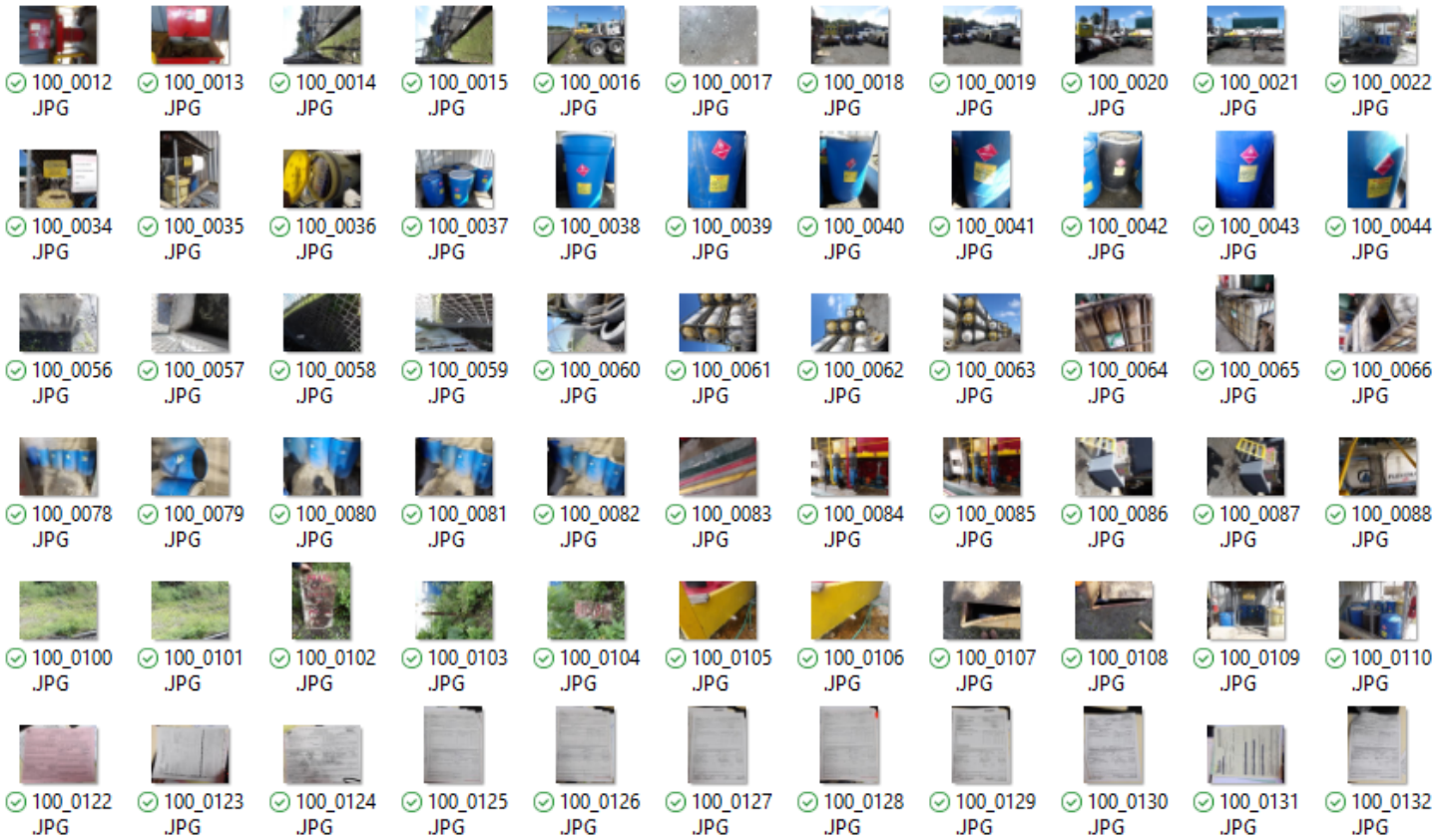
Resource Conservation and Recovery Act  
Dana Transport  
PRR00018259

---



Resource Conservation and Recovery Act  
Dana Transport  
PRR00018259

---



# Attachment III



**U.S . EPA REGION 2**

**INSPECTOR'S MULTI-MEDIA SCREENING CHECKLIST**

Facility Name: <b>Dana Transport</b>	Facility Point of Contact and Title: <b>David P. Lacavera</b> <b>Assistant to the Environmental Manager</b>
Facility Address: <b>195 Industrial Park Luchetti Carretera 5</b> <b>Bayamon, Puerto Rico 00961</b>	Facility POC Phone and E-mail: <b>David P. Lacavera</b> <b>dlacavera@danacompanies.com</b>
Inspector Name and Phone: <b>Khrystian M. Vazquez</b>	Date of Inspection: <b>January 23, 2025</b>

Make referrals directly via email only to Erin Floto, Multi-Media Referrals Coordinator (MMRC)

[Floto.Erin@epa.gov](mailto:Floto.Erin@epa.gov)

Date of Referral: **January 28, 2025**

Supervisors may be cc'd on email

**\*\*Guidance for completing the Multi-Media Inspection Checklist\*\***

The Multi-Media Screening Checklist should be filled out during the visit.

Inspectors are not expected to be experts in all media. If something looks odd or suspicious, use the provided questions, document and take photos of the suspicious activity. If you answer yes to any of the questions below, inform the MMRC ASAP that you observed possible non-compliance in another program area during your inspection and send the checklist including comments and photographs to complete the referral.

Inspectors should record preliminary observations on this checklist, which can assist in determining compliance at a later date. Compliance determinations are not made in the field.

**Please remember when submitting this checklist to provide *detailed* comments and photos for each section you observe possible non-compliance activities**

**AIR**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe dark or white smoke or dust clouds from any source?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe opaque (obscuring) smoke being emitted for >5 minutes? (If possible, take video)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you notice any unusual odors or strong chemical smells?

**WATER**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe poorly maintained equipment/containers exposed to precipitation?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe pollutants (e.g. petroleum, oil, chemicals, sediments, process water, etc.) going into an indoor floor drain or outdoor catch basin?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe a discharge from a pipe to surface water that was turbid or had a strange odor, color, sheen or foam?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe heavy (earth-moving) equipment adjacent to apparent wetland areas?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any clearing, filling, dredging, ditching, construction, etc. being conducted on or over the wetland areas?

**HAZARDOUS WASTE AND CHEMICALS**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe evidence in work areas, storage areas or laboratories of abandoned containers or materials? Please note as much information about the contents of the containers and types of materials, including their chemical/physical properties as possible in comments along with the reason believe they have been 'abandoned'.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any containers or tanks that contained materials/substances that were leaking, damaged, or in poor condition? Please note as much information about the contents of the containers or tanks as possible in comments, including their chemical/physical properties along with the condition of the containers/tanks.

**PESTICIDES**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe pesticides sold in unlabeled containers or with hand-written labels or with labels with no English?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe possible improper use of pesticides (adverse human reaction, dead animals, plant damage, etc.) or storage of pesticides (open containers, unconstrained gas canisters, no ventilation in storage room, etc.)?

**TOXIC AND HAZARDOUS SUBSTANCES/MATERIALS**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any liquid-filled electrical equipment or hydraulic systems that the facility representative confirmed were installed pre-1980?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any electrical equipment leaking or did you observe stains on the floor or concrete pad near such equipment?

**OIL STORAGE/SPILLS**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe rainbow sheen or foam on surface waters or ground or next to storm drain?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did the facility have an oil spill within the last 12 months that reached surface waters?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any automatic tank gauge in alarm status for underground storage tanks (USTs)?

**EMERGENCY RESPONSE & PREVENTION**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe an oil spill or chemical spill into secondary containment, storm drain, or a waterway?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Is the facility under emergency operations, evacuation, or shelter in place due to an actual chemical or oil release, or potential for chemical or oil release?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe a chemical, flammable, or oil release, including a spill or explosion, into the air, water, or soil?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe process equipment in poor condition that could result in a release? (corrosion, lack of maintenance)

**WORKER SAFETY**

<input type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe employees working in dangerous conditions (excessive noise, chemical exposure, at heights above 10ft) without proper PPE?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe employees entering or working in confined spaces (vaults, pits, tanks, enclosures not designed for occupancy) with limited access/ingress/egress?

**CRIMINAL ACTS****(Do not read aloud)**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any deliberate acts of dumping or discharging wastes?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe actual harm to individuals as a result of EPA violations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe other activity or behavior that indicates possible criminal behavior?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe an alteration of facility records that would constitute a potential criminal violation?

**COMMENTS AND PHOTOGRAPHS:**

Following your visit, please use this section to type detailed comments concerning possible non-compliance activities and photographic evidence of those activities. Please include the media title for each comment.

(i.e. AIR: \_\_\_\_\_)





Picture 100-001  
Used Oil Recycled Area



Picture 100-002  
Inside container of used oil



Picture 100-003  
Used oil containers



Picture 100-004  
Inside look of used oil container



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by:  
K.Vazquez  
Date:  
2023-01-23



Picture 100-005  
Container for used oil



Picture 100-006  
Pads with oil



Picture 100-007  
Container for empty aerosols



Picture 100-008  
Inside view for empty aerosols



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by: K.Vazquez  
Date:  
2023-01-23



Picture 100-009  
Designated Area for Used Oil



Picture 100-022  
Side view of HWSA



Picture 3 — 100-023  
Side view of HWSA



Picture 100-024  
Front view of HWSA



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by:  
K.Vazquez  
Date:  
2023-01-23



Picture 100-025  
HWSA Alarm System



Picture 100-027  
Complete Front view of HWSA



Picture 100-028  
Ramp Access for HWSA



Picture 100-029  
Inside view of HWSA



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by::  
K.Vazquez  
Date:  
2023-01-23



Picture 100-031  
Side view of HWSA, emergency information sign



Picture 100-035  
Complete right side view of HWSA



Picture 100-037  
Containers inside the HWSA



Picture 100-047  
Container with top lid crack



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by:  
K.Vazquez  
Date:  
2023-01-23



Picture 100-048  
Information of Hazardous waste inside container with cracked lid

Picture 100-049  
Information of Hazardous waste inside container with cracked lid



Picture 100-050  
Inside view of container with cracked lid

Picture 100-056  
HWSA controlled valve missing



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by:  
K.Vazquez  
Date:  
2023-01-23



Picture 100-057  
Inside view of HWSA controlled valve



Picture 100-059  
Outside view of HWSA, no evidence of water hose stream



Picture 100-065  
Non-Hazardous waste container



Picture 100-078  
Container use for raw material



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by: K.Vazquez  
Date:  
2023-01-23



Picture 100-081  
Labels were removed from containers use for raw material

Picture 100-107  
Oil tramp lid, does not fit the tramp

Picture 100-117  
Manifest missing certification of receipt signature

Picture 100-118  
LDR missing for manifest #024071655 JJK



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by:  
K.Vazquez  
Date:  
2023-01-23

Manifest Form for Dana Transport, dated 01/10/2023. The form includes fields for generator information (CLEAN HORIZONS FLORIDA LLC), transporter information (Dana Transport), and waste details (UNIDENTIFIED SOLID WASTE). It features a table for waste tracking with columns for quantity, weight, and date. Signatures for Luis Rivera and Alison Cora Rosado are present.

Picture 100-133  
Manifest missing certification of receipt signature

Manifest Form for Dana Transport, dated 01/10/2023. The form includes fields for generator information (CLEAN HORIZONS FLORIDA LLC), transporter information (Dana Transport), and waste details (UNIDENTIFIED SOLID WASTE). It features a table for waste tracking with columns for quantity, weight, and date. Signatures for Roselio Hernandez and Alison Cora Rosado are present.

Picture 100-132  
Manifest missing certification of receipt signature

Facility Daily Inspection Log

This document required to be completed daily per inspection of all facility drum containable area and storage area, discharge levels and temperature levels for ammonia regulatory and all other containers.

Month: Jan 2023

TIME	INSPECTOR	AISLE SP.	LAB/ACC DATE	CONDITION	REMARKS
1.					
2.	6 AM L.R.	OK	OK	OK	
3.	6 AM C.R.	OK	OK	OK	
4.					
5.					
6.					
7.	6 AM C.V.	OK	OK	OK	
8.	6 AM C.R.	OK	OK	OK	
9.	6 AM L.R.	OK	OK	OK	
10.	6 AM L.R.	OK	OK	OK	
11.					
12.					
13.	6 AM C.R.	OK	OK	OK	
14.	6 AM C.V.	OK	OK	OK	
15.	6 AM C.R.	OK	OK	OK	
16.	6 AM L.R.	OK	OK	OK	
17.	6 AM C.R.	OK	OK	OK	
18.					
19.					
20.	6 AM L.R.	OK	OK	OK	
21.	6 AM L.R.	OK	OK	OK	
22.	6 AM L.R.	OK	OK	OK	
23.	6 AM L.R.	OK	OK	OK	
24.	6 AM L.R.	OK	OK	OK	
25.					
26.					
27.					
28.					
29.					
30.					
31.					
32.					
33.					

NOTE: All on-the-horizons waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The container drum area must contain one drum only with a secured top handle closed at all times.

Picture 100-138  
January weekly log



Title:  
Appendix I—Facility Pictures  
EPA ID:  
PRR000018259

Facility:  
Dana Transport  
Project:  
CEPD-RCRA-09-141

Pictures taken by:  
K.Vazquez  
Date:  
2023-01-23