

RCRA Inspection Report

1) Inspector and Author of Report

Kayla Acosta
Physical Scientist
Phone: 404-562-8451
Acosta.kayla@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Invincible Boat Company
4705 N.W. 132nd Street
Opa Locka, Florida 33054

EPA ID#: FLR000037341
NAICS #: 336612 – Boat Building

3) Responsible Officials

Randall Rayle
Sr. Manager Facilities and EHS
randall.rayle@warbirdmarineholdings.com

4) Inspection Participants

Randall Rayle, Invincible Boat Company
Andres Lopez, Invincible Boat Company
Thomas Giovia, Invincible Boat Company
Shelby Luong, Florida Department of Environmental Protection (FDEP)
Kaitlyn Edwardo, FDEP
Jeff Gregg, FDEP
Kayla Acosta, U.S. Environmental Protection Agency (EPA)

5) Date of Inspection

February 6, 2025, at 9:45 A.M.

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.)

Pursuant to Fla. Admin. Code Ann. r. 62-730.020(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any 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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with [State Regulation] [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Invincible Boat Company’s compliance with the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection.

8) Facility Description

Invincible Boat Company (known hereinafter as “IBC” or “the facility”) is a boat manufacturer. The lamination process (mold creation, preparation, and construction) of the hull including

rewiring is now mostly completed at the company's Mexico facility in Mérida, Yucatán, Mexico while the hull assembly is conducted at this facility. The facility began operations in 2006 and is comprised of 4 buildings which cover 1 acre of land. Building 1 of 5 was used for lamination and was the largest generation of hazardous waste; however, this operation was transferred to the Mexico facility over a year ago. This building is now closed and empty and will be leased to a new occupant. The facility employs 220 workers and operates Monday through Friday from 6:00 am to 2:30 pm. The facility is connected to the city water and sewer.

The facility first notified of their regulated waste activities on December 2, 1997, as a Small Quantity Generator (SQG) of hazardous waste. On February 28, 2020, the facility notified as a Large Quantity Generator of hazardous waste (LQG). The facility most recently notified of their regulated waste activity on March 1, 2024, as an LQG. Facility personnel stated that because their lamination operation in Building 1 has ceased, the facility is no longer generating LQG amounts of hazardous waste and would be renotifying as an SQG. The facility generates hazardous waste with the following EPA waste codes: D001 (ignitability characteristic) and F003 (spent non-halogenated solvents). The facility may also generate used oil. Used lead-acid batteries are returned to the battery supplier for credit.

9) Previous Inspection History

FDEP has conducted two RCRA CEIs at the subject facility between 2015 and 2025 and found six violations during those inspections.

On July 15, 2020, FDEP conducted the most recent RCRA CEI at the subject facility and found four apparent violations of RCRA's requirements for records related to employee position descriptions and training for employees handling hazardous waste, submitting copies of the contingency plan to local authorities, generator category determination, and documentation for weekly inspections of the central accumulation area. As a result, FDEP issued an informal verbal enforcement action and provided compliance assistance.

10) Opening Conference

On February 6, 2025, EPA inspector Kayla Acosta, accompanied by FDEP inspector Shelby Luong, FDEP Environmental Consultant Kaitlyn Edwardo, and FDEP Environmental Manager Jeff Gregg, arrived at IBC at approximately 9:45 A.M. Randall Rayle, Sr. Manager Facilities and EH&S, immediately received the inspectors. Randall Rayle, and the inspectors were joined by Andres Lopez, EHS Coordinator, for the opening conference. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a

business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Mr. Rayle provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before facility representative led the inspectors on a tour of the facility operations.

11) Inspection Observations

BUILDING 3:

Boat parts that have undergone lamination and pre-electrical wiring in Mexico are received at Building 3. Operations in this building include carpentry work, installation of speakers, deck work on minor blemishes, and creating open holes for cup holders. Hatches and doors are sanded down, polished, and finished before being sent to final assembly. Some molding does take place to experiment with new resins or fiberglass. Safety data sheets for all products stored at the facility are available online. The inspectors observed the following waste in this area (Photo 1):

- One 55-gallon container of used solvent-contaminated wipes in a designated satellite accumulation area (SAA). The container was closed and labeled as "Hazardous Waste", missing an indication of the hazard, and marked with a Class 9 DOT placard. Because the Class 9 DOT placard does not indicate any specific hazard associated with the waste, the EPA has determined that it is not appropriate to meet the RCRA indication of hazards labeling standard ([Frequent Questions About Implementing the Hazardous Waste Generator Improvements Final Rule | US EPA](#)).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], a generator must mark or label its container with the following: (ii) 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).

BUILDING 2:

Building 2 operations include piecing parts together and working on consoles that are received from the Mexico facility. Other activities in this area include repairing boat parts that have scratches through sanding, polishing, and painting. The inspectors observed the following wastes (Photos 02-04):

- Two 55-gallon containers of used solvent-contaminated wipes in separate designated SAAs. The containers were closed and labeled as "Hazardous Waste", missing an indication of the hazard, and marked with a Class 9 DOT placard. Because the Class 9 DOT placard does not indicate any specific hazard associated with the waste, the EPA

has determined that it is not appropriate to meet the RCRA indication of hazards labeling standard ([Frequent Questions About Implementing the Hazardous Waste Generator Improvements Final Rule | US EPA](#)).

- One 55-gallon container of waste acetone in a designated SAA. The container was closed, marked with an indication of the hazard of the contents, but missing a hazardous waste label.
- One 55-gallon container of used solvent-contaminated wipes in a designated SAA. The container was closed, marked with an indication of the hazard of the contents, but did not have a hazardous waste label.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i)(ii)], a generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (ii) 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).

Central Accumulation Area (CAA):

IBC manages a hazardous waste CAA in the Building 2. IBC manages ignitable waste in the CAA. The inspectors did not observe “No Smoking” signs at the CAA.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(1)(vi)(B)], the large quantity generator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to the following: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. 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.

All buildings including the CAA is equipped with a Public Address system and alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped automatic sprinklers. Fire extinguishers are inspected annually by CINTAS while IBC inspects them monthly along with eyewash stations. The inspectors observed the following hazardous waste (Photo 05):

- One 55-gallon container of waste acetone. The container was closed and was marked with an indication of the hazard of the contents, but did not have a hazardous waste label or a start accumulation date.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(A)(C)], A large quantity generator must mark or label its containers with the following: (A) The words “Hazardous Waste”; (C) The date upon which each period of accumulation begins clearly visible for inspection on each container.

BUILDING 5:

Building 5 is used for installation and assembly of all boat parts and contains a stock room for tools and equipment. Operations include reinforcing the transom of the boat and installation of electrical wiring for battery connection. Inspectors observed the following waste:

- One 33-gallon waste receptacle which had solid waste, and a red fiberglass paste material inside and another 33-gallon waste receptacle with solid waste and a blue liquid (Photos 06-07). At the time of the inspection, facility personnel could not identify what the wastes were or what process they were generated from; however, facility personnel stated they would investigate and hold these containers for a waste determination. The containers were also going to be re-labeled “Hazardous Waste—Pending Analysis”.
- Two 55-gallon containers of used solvent-contaminated wipes in a SAA. The containers were closed, and not marked with an indication of the hazard of the contents, and did not have a hazardous waste label (Photos 08 and 09).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 40 C.F.R. § 261.2, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i)(ii)], a generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (ii) 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).

Stock room:

The stock room holds products and tools. Used lead acid batteries are sent back to the supplier Royal Battery store for credit. No used batteries were observed in this area.

BUILDING 4:

Building 4 is used for final preparation and final inspection. This includes the installation of upholstery and gator steps. After final inspection, the boats are prepared for transport. No hazardous waste was observed in this area.

12) Records Review

Based on manifest records and operational changes, IBC appears to be operating as a SQG of hazardous waste and is in the process of renotifying FDEP to change their generator status.

Contingency Plan and Quick Reference Guide (QRG) for LQGs:

The actions that facility personnel should take in response to an emergency are described in the facility's contingency plan, which was last updated in 2015. The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Veronica Rubio is listed as the primary emergency coordinator; however, Randall Rayle is the alternate and is not listed. The contingency plan was in the process of being updated due recent personnel changes within the last six months. The plan does not include a list of all emergency equipment at the facility. The plan does not include the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan includes an evacuation plan for personnel. The plan does not include a quick reference guide which is a LQG requirement that became effective on May 30, 2017.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.261(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.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.261(e)], the plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

A copy of the contingency plan was most recently submitted to the Opa-Locka Fire Department, Miami-Dade Fire Rescue, Opa-Locka Police Department, Hialeah Hospital, and Palmetto Hospital on January 29, 2015.

WARNING FOR LQGS AMENDING THEIR CONTINGENCY PLAN AFTER MAY 30, 2017: Please note that Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)] requires an LQG that is

amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the contingency plan are specified in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.261], and the required contents of the quick reference guide are specified in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)].

On February 26, 2025, the facility submitted via email to the inspectors a copy of the 8700-12 form sent to FDEP to re-notify as a SQG of hazardous waste. The facility also provided an updated contingency plan with Randall Rayle listed as an alternate emergency coordinator and submitted the updated plan to the local authorities on February 26, 2025.

Training Records for LQGs:

At the time of the inspection, position descriptions and a written description of introductory and annual RCRA training was not available for review. A training record for Randall Rayle was available for review from Lion Technology RCRA Hazardous Waste Management Webinar from February 13, 2024.

Training records for employees handling hazardous waste were provided via email by Randall Rayle on February 26, 2025. Training records included online Hazardous Waste Management training which was held in July 2022, February 2023, February 2024, and July 2024.

WARNING OF RECORD KEEPING REQUIREMENTS: Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iv)(C)], the large quantity generator must maintain the following documents and records at the facility: (C) a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (a)(7)(iv)(A) of this section.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2024. No shipments of hazardous waste have been conducted for 2025. Hazardous waste manifest records show that hazardous waste is routinely shipped to Allworth, LLC ALD094476793, and the most recent shipment was made on June 04, 2024.

Weekly Inspection Records:

The facility provided weekly inspections for the CAA. The facility documents conditions condition of containers, date and time of inspections, and the name of the person conducting the inspections. At the time of the inspection, records of weekly inspections of the CAAs for parts of 2022 were not available for review. These records were provided by email following the inspection.

Biennial Reporting:

The 2023 Biennial Report was available for review onsite and was submitted to FDEP on March 01, 2024.

Waste Determinations:

The facility uses Safety Data Sheets and works with their hazardous waste transporter ChemKlean Corporation (EPA ID: FLR000083071) for making hazardous waste determinations and creating waste profiles. Records were available for review.

13) Closing Conference

The inspectors conducted the exit meeting at with Randall Rayle and Andres Lopez. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Mr. Rayle stated that the facility will begin managing used solvent-contaminated wipes under the Excluded Solvent-Contaminated Wipes regulations found in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.4], either to be sent for disposal (Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.4(b)(18)]) or to be sent for cleaning and reuse (Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.4(a)(26)]). Facility personnel agreed to provide photos of re-labeled containers of excluded solvent-contaminated wipes. Mr. Rayle also stated he would be completing a new 8700-12 form to submit to FDEP within the next few weeks, submit any weekly inspections that could be found for 2022, submit training records for employees handling hazardous waste, and waste determinations for the blue liquid and the red fiberglass paste material observed in waste receptacles within the next few weeks.

On February 26, 2025, Randall Rayle provided the inspectors via email photos of relabeled solvent-contaminated wipes containers with accumulation start dates, a photo of a “No Smoking” sign, missing weekly inspections from 2022, manifest records, training records for employees handling hazardous waste, the 8700-12 notification of regulated waste activity submitted to FDEP to change the facility’s status from an LQG to an SQG.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

KAYLA ACOSTA

Digitally signed by KAYLA
ACOSTA

Date: 2025.04.08 13:08:19 -04'00'

Kayla Acosta
Physical Scientist

16) Concurrence

LAURIE BENTON

Digitally signed by LAURIE
BENTON

Date: 2025.04.09 09:06:28 -04'00'

for Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

[09] Photos taken on: February 06, 2025

Photos taken by: Kayla Acosta

Photos taken with iPad

EPA Property Tag: SS8386



Photo 01			IMG-2025020611131713173920585.jpg
02/06/2025 11:13 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Building 3			25.89268331, -80.27574737
55-gallon container of used solvent-contaminated wipes in a designated satellite accumulation area (SAA). The container was closed and labeled as "Hazardous Waste", missing an indication of the hazard, and marked with a Class 9 DOT placard.			



Photo 02			IMG-2025020611303630362112975.jpg
02/06/2025 11:30 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Building 2			25.89293454, -80.27585559
One of two 55-gallon containers of used solvent-contaminated wipes in separate designated SAAs. The containers were closed and labeled as "Hazardous Waste", missing an indication of the hazard, and marked with a Class 9 DOT placard.			



Photo 03			IMG-2025020611352835282620089.jpg
02/06/2025 11:35 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Building 2			25.89315928, -80.27580097
55-gallon container of used acetone in a designated SAA. The container was closed, marked with an indication of the hazard of the contents, but missing a hazardous waste label.			



Photo 04			IMG-2025020611413741372433106.jpg
02/06/2025 11:41 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Building 2			25.89279607, -80.27626293
55-gallon container of used solvent-contaminated wipes in a designated SAA. The container was closed, marked with an indication of the hazard of the contents, but did not have a hazardous waste label.			



Photo 05			IMG-202502061140014012794633.jpg
02/06/2025 11:40 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Building 2			25.89310802, -80.27609541
55-gallon container of used acetone. The container was closed and was marked with an indication of the hazard of the contents, but did not have a hazardous waste label or a start accumulation date.			



Photo 06			IMG-202502061207577572346441.jpg
02/06/2025 12:07 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Building 5			25.89303761, -80.27491714
33-gallon waste receptacle with solid waste and a blue substance.			



Photo 07 - Building 05			IMG_6510.jpg
02/06/2025 12:04 PM (ET)	No CBI	No PII	Photographer: Shelby Luong
33-gallon waste receptacle with solid waste and a blue substance.			



Photo 08			IMG-2025020612154515451907192.jpg
02/06/2025 12:15 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Building 5			25.89300363, -80.27450885
One of two 55-gallon containers of used solvent-contaminated wipes in a SAA. The containers were closed, and not marked with an indication of the hazard of the contents, and did not have a hazardous waste label			



Photo 09			IMG-2025020612202920292003903.jpg
02/06/2025 12:20 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Building 5			25.89310507, -80.27461536
One of two 55-gallon containers of used solvent-contaminated wipes in a SAA. The containers were closed, and not marked with an indication of the hazard of the contents, and did not have a hazardous waste label			