**RCRA Inspection Report**

## 1) Inspector and Author of Report


William Kappler
Physical Scientist
RCRA Enforcement Section
Phone: (404) 562-8498
kappler.william@epa.gov

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

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


## 2) Facility Information

Advanced Environmental Options, Inc.
25 Stan Perkins Road
Spartanburg, Spartanburg County
South Carolina 29307

EPA ID: SCR000074575
NAICS #: 562910 – Remediation Services

## 3) Responsible Official

David W. Hitchens
Environmental Chemist/CEO
Phone: (864) 488-9111
dhitchens@aeoweb.com

## 4) Inspection Participants

David W. Hitchens, Advanced Environmental Options, Inc.
Vince Goldner, Advanced Environmental Options, Inc.
Victor R. Goldner, Advanced Environmental Options, Inc.
Tom Richmond, South Carolina Department of Environmental Services
Kayla Acosta, U.S. Environmental Protection Agency, Region 4
William Kappler, U.S. Environmental Protection Agency, Region 4

## 5) Date of Inspection

June 18, 2024, at 9:00 a.m.

## 6) Applicable Regulations[1]

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. §§ 6925 and 6927), South Carolina Hazardous Waste Management Act (SCHWMA), S.C. Code Ann. § 44-56-10 *et seq*., and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279, and [40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279].

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

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

Pursuant to S.C. Code Ann. Regs. 61-79.261.2(c)(3) [40 C.F.R. § 261.2(c)(3)], materials are solid wastes if they are *recycled*—or accumulated, stored, or treated before recycling—as specified in paragraphs (c)(1) through (4) of this section.

Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a transfer facility means any transportation-related facility, including loading docks, parking areas, storage areas and other similar areas where shipments of hazardous waste or hazardous secondary materials are held during the normal course of transportation.

[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 S.C. Code Ann. Regs. 61-79.273.9 [40 C.F.R. § 273.9], a large quantity handler of universal waste (LQHUW) means a universal waste handler who accumulates 5,000 kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which the 5,000-kilogram limit is met or exceeded.

Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a destination facility means a facility that treats, disposes of, or recycles a particular category of universal waste, except those management activities described in paragraphs (a) and (c) of 40 C.F.R. §§ 273.13 and 273.33. A facility at which a particular category of universal waste is only accumulated, is not a destination facility for purposes of managing that category of universal waste.

## 7) Purpose of Inspection

The purpose of this inspection was for the U.S. Environmental Protection Agency, Region 4, and the South Carolina Department of Environmental Services, to conduct a joint unannounced compliance evaluation inspection (CEI) at Advanced Environmental Options, Inc. (hereinafter, "AEO" or "AEO 1" or "AEO 2" or the "facility") to determine compliance with the applicable requirements of the Resource Conservation and Recovery Act (RCRA) and the corresponding South Carolina Department of Environmental Services (SCDES) regulations. This was an EPA lead inspection.

## 8) Facility Description

AEO is located at 25 Stan Perkins Road, Spartanburg, Spartanburg, County, South Carolina, Latitude, 35.03304, and Longitude, -81.87451 (AEO 1). AEO 1 has been at its present location since late 2008 and consists of approximately 13 acres. The AEO1 facility at 25 Stan Perkins Road consists of one large open concept interconnected warehouse building, containing a laboratory, and office space under one roof. The warehouse consists of approximately 25,000 square feet of space and the laboratory utilizes approximately 3,000 square feet of space. The City of Spartanburg provides potable water and sanitary sewer services.

The adjacent AEO property located at 150 Poly Deck Way (also known as 150 Franke Drive) Spartanburg, Spartanburg, County, South Carolina, Latitude, 35.033370, and Longitude, -81.870503 (AEO 2) is operated under the same EPA ID number, as the properties are contiguous. AEO 2 has occupied the 150 Poly Deck Way property since 2007 and it consists of one large building on approximately five acres. AEO indicated that the building is currently occupied by local government.

Both properties (AEO 1 and 2) are owned by SACAA LLC. AEO 1 employs approximately 28 people and operates Monday through Friday, from 8:00 a.m. to 5:00 p.m., including some after business hours and weekend emergency response work.

AEO submitted its most recent RCRA Site Identification Form, 8700-12, of its regulated waste activity to SCDES, on January 15, 2009, notifying as not a generator of hazardous waste, a hazardous waste transporter, an exempt small quantity on-site burner and a large quantity handler of universal waste batteries, lamps, pesticides, and mercury containing equipment. The AEO notification identified the hazardous waste codes D001, D002, and F003. AEO has registered as a biohazardous waste transporter, a universal waste destination facility and a used oil transporter with the SCDES. The primary NAICS code for the facility is 562910, Remediation Services.

Previously on October 23, 2008, AEO had notified as a small quantity generator of hazardous waste (SQG), a hazardous waste transporter and a large quantity handler of universal waste batteries, lamps, pesticides, and mercury containing equipment. The AEO notification identified the hazardous waste codes D001, D002, and F003.

AEO is an emergency response company providing a wide range of site remediation and restoration services with approximately 1,000 customers. AEO 1 operates and stores hazardous waste in a 10-day transfer facility, consolidates non-hazardous solid and liquid wastes, is a steel and plastic drum recycler, is a large quantity handler of universal waste (LQHUW), and operates a batch wastewater pretreatment facility (WWTF).

AEO offers waste transportation services for:

- non-RCRA regulated waste;
- non-hazardous waste solids and liquids;
- hazardous waste;
- hazardous waste from law enforcement, including methamphetamine laboratories in lab pack;
- empty plastic and steel product containers;
- wastewater in bulk; and
- universal waste batteries, lamps, mercury containing equipment, pesticides, and aerosol cans.

AEO utilizes a less than 10-day transfer facility to manage hazardous waste while in transit.

AEO's services include:

- Transportation and incidental storage for 10-days or less at a RCRA transfer facility of hazardous waste destine for Tradebe Treatment and Recycling of TN, LLC in Millington, Shelby County, Tennessee (TND000772186) (Tradebe) for treatment, storage, or disposal, on a uniform hazardous waste manifest (UHWM);
- transportation and incidental storage for 10-days or less at a RCRA transfer facility of hazardous waste from law enforcement agency activities, including methamphetamine laboratories in lab pack containers destine for Tradebe (TND000772186) and/or to Drug and Laboratory Disposal Environmental Services, Inc. (DLD), in Plainwell, Allegan County, Michigan (MID092947928) on a UHWM;

- Transportation, incidental storage, and consolidation of non-RCRA regulated waste and non-hazardous waste solids destine for Advanced Environmental Options facility for solidification (NCS000002687) at 1383 NC Highway 120, Mooresboro, Rutherford County, North Carolina (AEO 3), Latitude, 35.276365, and Longitude, -81.750842 using a non-hazardous waste manifest. The waste that is solidified at AEO 3 is then transported to South Carolina for disposal in either the Anderson or Union County landfills. The containers of waste solids and liquids are transported using a non-hazardous waste manifest.
- Transportation, incidental storage, consolidation, and treatment of non-RCRA regulated waste and non-hazardous waste liquids using a non-hazardous waste manifest. The liquids are either pumped out of the containers and treated in the WWTF or transported to the AEO 3 for solidification.
- Transportation and storage of empty plastic and steel product containers. The plastic containers are cut up and stored in a roll off container for off-site disposal to a landfill. The steel containers are no longer crushed at AEO. The crushing of steel containers stopped about one year ago. AEO presently transports the steel containers for recycling to AEO 3 and to ESS Metal Recycling in Woodruff, South Carolina. Empty plastic and steel containers are no longer stored at AEO 2.
- Operation of three vac trucks and one vac tanker to transport wastewater in bulk. AEO stores the wastewater in either an 8,000-gallon aboveground storage tank (AST) or in a 12,000-gallon underground concrete tank prior to treating the wastewater in its WWTF. The wastewater is transported using a non-hazardous waste manifest or a bill of lading.
- Transportation, storage and consolidation of universal waste batteries, lamps, mercury containing equipment, pesticides, and aerosol cans. Batteries and lamps are consolidated and transported off-site to a destination facility. Pesticide such as ant killer is sometimes used by the facility on its property. Universal waste lamps are shipped on a bill of lading to Lightning Resources, LLC, a universal waste destination facility in Johnson City, Tennessee. The universal waste is transported using a bill of lading. AEO ships hazardous materials possibly consisting of unused commercial chemical products on a bill of lading.
- Aerosol cans are punctured on-site to remove the liquid from the can. The liquid is stored in a 55-gallon container as hazardous waste for off-site treatment, storage, or disposal. Punctured aerosol cans are shipped to ESS Metal Recycling in Woodruff, South Carolina on a bill of lading (BOL).
- Transportation and storage of E-waste destine for Powerhouse Recycling.

## 9) Previous Inspection History

AEO was inspected by the SCDES on October 9, 2019, for compliance with state and federal hazardous waste regulations. SCDES issued an NOV for the alleged storage of numerous containers without aisle space, containers not kept closed, and containers not in good condition (bulging, leaking, and rusted), and for containers labeled "non-RCRA regulated waste" or non-hazardous waste that may contain hazardous waste.

AEO was inspected by the EPA on October 26, 2012, for compliance with state and federal hazardous waste regulations. Potential violations were not observed at that time.

## 10) Opening Conference

On June 18, 2024, the EPA inspectors William Kappler and Kayla Acosta, accompanied by SCDES inspector Tom Richmond, arrived at AEO at approximately 9:00 a.m. The inspectors were received by Victor Goldner, Project Manager with AEO at the building front entrance. The inspectors signed a visitor's log. The inspectors were escorted by Victor Goldner to a conference room and were joined by Vince Goldner, Vice President for an opening conference. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit.

The inspectors described the anticipated use of a digital camera and the use of an iPad to conduct and document the inspection electronically as well as by logbook. The EPA inspectors provided a written list of the records needed for review. The EPA inspectors 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 inspectors also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information provided to the EPA. AEO did not assert a business confidentiality claim.

AEO 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 AEO representatives Victor Goldner and Vince Goldner (AEO representatives) escorted the inspectors on a tour of the facility.

## 11) Inspection Observations

*Laboratory*

AEO representatives indicated to the inspectors the laboratory operations were discontinued on or about 2009-2010. AEO indicated to SCDES inspectors during the October 9, 2019, RCRA CEI that the Laboratory had not been used for approximately seven years. The latest laboratory certification observed by SCDES posted on the wall at the time of the 2019 CEI was for lnfiniti Labs for FY2011/2012.

The main Laboratory area is constructed with several rows of laboratory benches and multi-level shelfs. The Laboratory is constructed with several side laboratories and storage rooms.

Located on the floor near the front entrance to the Laboratory the inspectors observed one five-gallon container marked with the words "AZZ Sludge NAOH Corrosive" and one five-gallon container marked with words "AZZ Liquid NaOH Corrosive." The inspectors observed one five-

gallon container had approximately one gallon of solids. AEO representatives indicated the containers had samples that arrived at AEO during the month of October or November 2023 (Photograph 1).

At the time of the CEI, inspectors observed that an accurate waste determination was not available.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to 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.**

In a side laboratory, the inspectors observed several containers of laboratory chemicals, chemical solutions and possible samples in a flammable cabinet ranging in volume from approximately several millimeters to several liters. The inspectors observed liter containers of laboratory chemicals labeled with the words methanol, sodium hydroxide, tolulene, and methyl ether. The inspectors observed several containers of chemical solutions and possible samples ranging in volume from approximately several milliliters to a quart marked or labeled with the words vinyl alcohol, methanol, formaldhyde, sodium nitrate, and xylene. Some of the containers were not clearly marked and labeled with words that could be read (Photographs 2 and 3).

At the time of the CEI, inspectors observed that an accurate waste determination was not available.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to 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.**

In a second side laboratory the inspectors observed several containers of laboratory chemicals, chemical solutions, and unknown liquids on a mobile cart ranging from approximately several milliliters to a liter. The inspectors observed one 500-milliliter container labeled with the word “Yttrium” and one 500-millimeter container labeled with word “Scandium.” The inspectors observed one 250-milliliter container marked with the words “0.035 sulfuric acid”. The inspectors observed one 250-milliliter container possibly marked with the words “2.5 ppm flouride, chloride, bromide, nitrate, phosphate, and sulfate”. The inspectors observed several containers of chemicals that were not clearly marked and labeled with words that could be read. (Photograph 4).

At the time of the CEI, inspectors observed that an accurate waste determination was not available.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to 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.**

In the main Laboratory inspectors observed several laboratory chemicals and chemical solutions on benches and on shelfs ranging in size from several millimeters to several liters. Near the rear of the Laboratory on a shelf the inspectors observed several 100 milliliter bottles of chemical standards containing the metals arsenic, barium, cadmium, selenium, or silver in two percent nitric acid. The standards were marked with the date May 13, 2011. The standard for cadmium was not marked with a date. On the same shelf the inspectors observed a 0.5-liter bottle of chemical reagent marked with the words "6.5 ppm Cal. Std. Hg". The number next to the abbreviated chemical symbol Hg could not be read. (Photographs 5, 6, 7, and 8).

At the time of the CEI, inspectors observed that an accurate waste determination was not available.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to 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.**

*Warehouse*

The Warehouse consists of a Universal Waste Storage Area, a Universal Waste and E-waste outdoor Trailer (UW and E-waste Trailer), the Drug Enforcement Agency (DEA) Cage, the Aerosol Can Puncture Area, the non-RCRA regulated and non-hazardous waste container storage area, the Warehouse Extended 10-day Transfer Facility, and the Container Storage Locker.

*Universal Waste Storage Area*

On the north side of the Warehouse AEO operates a Universal Waste Storage Area. The inspectors observed a 55-gallon container on a wooden pallet storing lead acid gel batteries next to a loading dock. The container was closed, in good condition, labeled with the words universal waste, and marked with the date August 8, 2023. The inspectors observed material in a plastic bag on top of the container, some housekeeping equipment and other miscellaneous material on the floor next to the container of universal waste (Photographs 9 and 10). The facility should keep the area surrounding the container clear of material.

*UW and E-waste Trailer*

On the north side of the Warehouse AEO operates a trailer for universal waste and E-waste. The inspectors observed a 40-foot trailer parked outdoors against the loading dock's overhead door. The inspectors observed several containers of universal waste batteries on wooden pallets. The containers were closed, in good condition, and labeled with the words universal waste. The inspectors observed two five-gallon containers storing lead acid batteries (Broad River Energy), and one five-gallon container storing lead acid batteries (Celligent) not marked with a start accumulation date. The inspectors observed one five-gallon container storing batteries (MK Metal Foils USA Inc., waste profile number 01661) marked with the date October 11, 2022. AEO representatives indicated a log is maintained on-site that identifies the date the universal waste was stored, this was reviewed and is discussed further in the Records Review Section of this Report.

The inspectors observed several containers storing four-foot, eight-foot, and smaller size universal waste lamps on wooden pallets labeled with the words universal waste and marked with a date. The inspectors observed one container storing lamps labeled with the words universal waste and marked with the date May 24, 2024. The inspectors observed the container was wrapped in green tape and was not closed (Photographs 11, 12, 13, and 14).

**Pursuant to S.C. Code Ann. Regs. 61-79.273.33(d)(1) [40 C.F.R. § 273.33(d)(1)], a large quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows: A large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.**

*DEA Cage*

On the north side of the Warehouse the inspectors observed the DEA Cage for the storage of controlled drugs. This area was secured and not inspected.

*Aerosol Can Puncture Area*

On the east side of the Warehouse AEO punctures and drains universal waste aerosol cans received from off-site sources to consolidate the contents. The inspectors observed a puncturing device connected to the top of a 55-gallon container used to drain the contents from the aerosol can. The inspectors observed the lid of the puncturing device was open exposing the container's open bung hole. The inspectors observed the 55-gallon container was not marked, or labeled with the words hazardous waste, and not marked or labeled with an indication of the hazards (Photographs 15, 16, and 17). The inspectors observed the punctured aerosol cans are stored in an open top 250-gallon tote.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of**

**hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.**

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: The words "Hazardous Waste".**

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

AEO closed the 55-gallon container and labeled it with the words hazardous waste, and with an indication of the hazards (Photograph 93).

The inspectors observed approximately 72 55-gallon containers in this area labeled non-RCRA regulated waste or non-hazardous waste. The inspectors observed the containers on wooden pallets stacked two pallets high, each pallet storing as many as four 55-gallon containers.

*Container Storage Area – Solid and Liquid Waste*

In the center of the Warehouse AEO stores containers of solid and liquid waste for consolidation and/or solidification at AEO 3 (Photographs 18, 19, 20, and 21). The inspectors observed 200 to 300 55-gallon containers and totes stored at least two to three aisles deep. The 55-gallon containers in the aisles were stored four per wooden pallet, stacked two or three pallets high. The inspectors could not inspect each container because aisle space was not maintained. The inspectors randomly inspected the accessible containers. The inspectors observed the containers that were visibly inspected were closed and labeled with the words non-RCRA regulated waste or the words non-hazardous waste.

The inspectors observed eight five-gallon containers of unused hazardous material from Pureon Company and several containers of unused environmentally hazardous substance, liquid, NOS (pentaerythritol tetra (mercaptopropionate)) (Photograph 18). The inspectors observed 55-gallon containers storing the following; glycol solids and glycol liquids (Auriga Polymers, Inc), oil and debris (Que Medical QMD), paint and rags and lab pack material (Anderson University Theater), potasium hydroxide and water (William Barnet and Sons, LLC), liquid formaldehyde (Celligent Diagnostic EPA ID # NCR0001831145) (Photographs 20 and 21), non-DOT non-RCRA material (Old Castle ARG), and paint thinner and rags (Converse College).

*Outdoor 10-Day Transfer Facility*

The Outdoor 10-day Transfer Facility (Outdoor Transfer Facility) is a locked 40-foot Sea and Land container located next to the Outdoor Mezzanine Container Storage/Wastewater Holding Area. The inspectors observed a no smoking sign, and signs marked danger hazardous waste storage posted on the exterior of the Outdoor Transfer Facility (Photograph 60). The inspectors did not observe spill kits or emergency equipment located near the Outdoor Transfer Facility. Hazardous waste is shipped to Tradebe. The inspectors could not inspect each container because of the number of containers and the lack of aisle space in the Outdoor Transfer Facility (Photograph 54). The inspectors observed approximately 10 one-cubic yard sacks, two 55-gallon containers, and several five-gallon containers stacked on other containers toward the back of the Outdoor Transfer Facility.

The inspectors observed two one-cubic yard sacks storing acetone and debris (D001, F003) generated by Vetroresina (SCR000769935), not marked, or labeled with an indication of the hazards and marked with the date April 30, 2024, on the hazardous waste label. The dates "new April 12, 2024" and "full April 23, 2024", were marked on the sacks (Photographs 54, 55, and 58).

The inspectors observed one 55-gallon container storing waste xylene (D001, F003) generated by Celligent Diagnostics (NCR000183145) not marked with a date on the hazardous waste label. The inspectors observed the top of the 55-gallon container was marked with the date May 9, 2024 (Photographs 54, 56, 57, and 59).

Each container in the Outdoor Transfer Facility could not be inspected to observe if it was closed, in good condition, labeled with the words hazardous waste, and dated.

AEO representatives indicated the storage date for containers in the Outdoor Transfer Facility is based on the transportation inbound date from the manifest.

At the time of the CEI, the inspectors observed that AEO was storing hazardous waste for more than 10 days, which requires a RCRA Permit and compliance with the RCRA requirements.

**Pursuant to S.C. Code Ann. Regs. 61-79.263.12(a) [40 C.F.R. § 263.12(a)], a transporter who stores manifested shipments of hazardous waste in containers meeting the independent requirements of § 262.30 of this chapter at a transfer facility for a period of ten (10) days or less is not subject to regulation under parts 264, 265, 267, 268, and 270 of this chapter with respect to the storage of those wastes.**

**Pursuant to the Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) as amended [Section 3005 of RCRA, 42 U.S.C. § 6925], owners and operators of treatment, storage and disposal facilities shall obtain a permit for the treatment, storage, and disposal of hazardous waste before first treating, storing, or disposing of hazardous waste.**

*Warehouse Extended 10-Day Transfer Facility*

On the south center of the Warehouse AEO stores hazardous waste in an extended 10-day transfer facility (Extended Transfer Facility). AEO representatives indicated the hazardous waste is stored in this area because the Outdoor 10-day transfer facility is full. The inspectors did not observe spill kits or emergency equipment located near the Extended Transfer Facility. The inspectors did not observe "no smoking" signs posted in this area for ignitable or reactive waste. The inspectors observed approximately 25 containers on wooden pallets storing hazardous waste that was closed, in good condition, marked or labeled with the words hazardous waste, marked, or labeled with an indication of the hazards, and marked with a date unless noted otherwise. The perimeter of the container area was surround by yellow tape, marked with the words "hazardous materials do not enter". The following is a visual inventory of containers observed in the Extended Transfer Facility at the time of the inspection.

Six one-cubic yard sacks storing F006 solids. The one-cubic yard sacks were labeled with a miscellaneous class 9 hazard indicator, not marked, or labeled with any other indication of the hazards, and not marked with a clearly observable date. Several one-cubic yard sacks could not be inspected because aisle space was not maintained.

The inspectors observed approximately 19 55-gallon containers storing hazardous waste solvent, (acetone and xylene), marked with the waste code D001 and F003. The inspectors observed approximately five 55-gallon containers were marked with the date June 11, 2024. The inspectors observed one 55-gallon container of hazardous waste was marked with the generator date of March 14, 2024, and marked with the transporter date of June 6, 2024.

Several containers could not be inspected to observe if they were closed, in good condition, labeled with the words hazardous waste, and dated, because aisle space was not maintained (Photographs 22, 23, 24, 25, 26, 27, 28, and 29).

At the time of the CEI, the inspectors observed that AEO was storing hazardous waste for more than 10 days, which requires a RCRA Permit and compliance with the RCRA requirements.

**Pursuant to S.C. Code Ann. Regs. 61-79.263.12(a) [40 C.F.R. § 263.12(a)], a transporter who stores manifested shipments of hazardous waste in containers meeting the independent requirements of § 262.30 of this chapter at a transfer facility for a period of ten (10) days or less is not subject to regulation under parts 264, 265, 267, 268, and 270 of this chapter with respect to the storage of those wastes.**

**Pursuant to the Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) as amended [Section 3005 of RCRA, 42 U.S.C. § 6925], owners and operators of treatment, storage and disposal facilities shall obtain a permit for the treatment, storage, and disposal of hazardous waste before first treating, storing, or disposing of hazardous waste.**

On the south side of the building adjacent to the Extended 10-Day Transfer Facility the inspectors observed one overpacked fiber board container with a corrosive hazard indicator, and no waste label, one 55-gallon container storing hydrogen peroxide identified with a corrosive hazard indicator, and three 55-gallon containers storing paint thinner and rags generated by Converse College.

The inspectors observed two 55-gallon containers labeled with the words non-hazardous waste generated by Broad River Energy Center. One container was storing motor oil and rags and the second container was storing oil rags and pads, marked with the date May 16, 2024 (Photographs 30 and 31).

*Warehouse Container Storage Locker*

On the east central area of the Warehouse AEO operates a Container Storage Locker (Storage Locker) for hazardous waste and for hazardous waste removed from methamphetamine laboratories. The Storage Locker is painted white, constructed of steel, a steel door, with a non-grated floor, and an apparent grated trench along the door's entrance. The inspectors observed signage posted on the exterior wall of the Storage Locker that included DOT placards and a no smoking sign (Photograph 32). The inspectors observed the information that is to be marked or labeled on containers of hazardous waste shipped to Tradebe and to DLD, posted on the Storage Locker (Photograph 36). The inspectors did not observe spill kits or emergency equipment located near the Storage Locker area. AEO representatives indicated the containers of hazardous waste in the Storage Locker are lab packs from VSQGs. The inspectors could not inspect each container because of the number of containers and the lack of aisle space in the Storage Locker (Photographs 33 and 34). From the doorway of the Storage Locker the inspectors observed containers ranging in size from five-gallon to 55-gallon and several large cardboard boxes. The inspectors observed one 55-gallon container labeled with the words hazardous waste and labeled with a flammable indication of the hazards, one five-gallon container labeled with the words hazardous waste (D001, D002, F002, F003), labeled with a flammable and corrosive indication of the hazards, and not marked with a date, one five-gallon container labeled with the words hazardous waste and labeled with a corrosive indication of the hazards, and one carboard box labeled with a flammable indication of the hazards. Each container in the Storage Locker could not be inspected to observe if it was closed, in good condition, labeled with the words hazardous waste, and dated (Photographs 33, 34, and 35).

At the time of the CEI, the inspectors observed that AEO was storing hazardous waste, which requires a RCRA Permit and compliance with the RCRA requirements.

**Pursuant to the Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) as amended [Section 3005 of RCRA, 42 U.S.C. § 6925], owners and operators of treatment, storage and disposal facilities shall obtain a permit for the treatment, storage, and disposal of hazardous waste before first treating, storing, or disposing of hazardous waste.**

*Outdoor Mezzanine Container Storage/Wastewater Holding Area*

The Outdoor Mezzanine Container Storage/Wastewater Holding Area (Mezzanine) is in the rear of the facility and can be accessed from the Warehouse. The Mezzanine is constructed with a concrete pad, a containment berm and containment trenches.

AEO stores containers of solid and liquid waste for consolidation and/or for solidification at AEO 3. Wastewater in containers is batch treated in the WWTF. AEO representatives indicated approximately 350 to 400 55-gallon containers and totes were stored in this area. The inspectors observed the containers and totes stored in at least 10 aisles. The 55-gallon containers were stored four per wooden pallet, stacked two to three pallets high. The totes were on an individual pallet, stacked two to three totes high. The inspectors could not inspect each container and tote because aisle space was not maintained. The inspectors randomly inspected the containers that could be accessed. The inspectors observed the containers that were visibly inspected were closed and labeled with the words non-RCRA regulated waste or the words non-hazardous waste (Photograph 37, 38, 41, and 42).

The inspectors observed a 55-gallon container labeled with the words non-hazardous waste storing oil and sludge generated by MOCOM, waste profile PROF015942. The container was covered with dried material on its exterior surface. No release was observed to the concrete pad (Photograph 39).

The inspectors observed two 250-gallon totes storing possible glue/adhesive with the hazardous waste labels and corrosive hazard indicator covered with black spray paint (Photograph 40).

The inspectors observed two 250-gallon totes labeled with the words non-hazardous waste storing oil, sludge, detergents generated by Total Clean, waste profile 16033 (Photographs 52 and 53).

The inspectors observed the containers and totes outside the concrete containment pad were empty (Photograph 43 and 44). The inspectors observed several totes in the second level Mezzanine. AEO representative indicated the totes were empty (Photograph 46). This area was not inspected.

*Wastewater Treatment Facility*

AEO conducts batch treatment of wastewater using oil and water separation, clarification, chemical treatment, and solids retention. The wastewater effluent is discharged to a publicly owned treatment works (POTW). AEO is currently not using the oil and water separator. Wastewater from the vac trucks and from containers is stored in a 12,000-gallon underground concrete tank prior to treatment. The wastewater is pumped to a clarifier for solids removal and next chemically treated in a process tank to facilitate solids removal. The wastewater is pumped back to the clarifer for solids separation. The solids are pumped to a holding tank. Wastewater effluent from the clarifer is discharged by pipe to the City of Spartanburg POTW. Solids are pumped from the holding tank and transported to AEO 3. AEO representatives

indicated they self-monitor the batch treatment process and submit monthly monitoring reports to the City of Spartanburg (Photograph 45).

*Outdoor Aboveground Storage Tank*

The outdoor aboveground storage tank (AST) holds about 8,000 gallons and is located across from the WWTF. The inspectors observed the AST appeared to be on a skid, was not marked or labeled and on the ground without secondary containment (Photographs 47 and 48). Wastewater generated by AEO customers is transported by vacuum truck and in containers for storage in the AST, prior to treatment in the WWTF. AEO also transports the wastewater to AEO 3 for solidification. AEO representatives indicated the AST was storing water and hydraulic oil generated by Ply Gem, wastewater and sludge generated by R&E Automated, and oil and water generated by Tuffaloy Products.

*Stormwater Pond*

The inspectors observed the surface of the stormwater pond covered in algae (Photographs 49 and 50).

*Tote Storage Yard*

The Tote Storage Yard is on the north edge of the property at the end of the entrance drive. The inspectors observed totes stored on the asphalt approximately 12 rows deep by four rows wide by five rows high. The totes that could be observed appeared empty. The totes that are in good condition are sold and unusable totes are shredded (Photograph 51).

*Gravel Yard*

AEO representatives indicated the Gravel Yard is where empty steel containers were crushed on the ground. The crushing of steel containers stopped about one year ago. Prior to the crushing operation AEO used a container shredder in this area. The container shredder is no longer operable. AEO has not remediated the Gravel Yard indicating to inspectors it was not necessary.

The inspectors observed several 20-cubic yard containers in the Gravel Yard. The inspectors observed one 20-cubic yard container was storing soil contaminated with gas, oil, and glycol generated from several remediated off-site spills. The contaminated soil was either generated off-site or stored at AEO at least since February 2024 (Photographs 62 and 67). One 20-cubic yard container was storing an unknown material (Photograph 66).

The inspectors observed staining on the ground surrounding the 20-cubic yard containers (Photographs 61, 63, 64, and 65). At the time of the CEI, inspectors observed that an accurate waste determination was not available.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to 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.**

*Maintenance Shop*
Light vehicle maintenance is conducted from the shop generating used oil. The inspectors observed a 250-gallon tote storing used oil with the word "used" ripped from the used oil label (Photograph 68).

**Pursuant to S.C. Code Ann. Regs. 61-79.279.22(c)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."**

*Boiler Area*
AEO representatives indicated the boiler has not been used for about ten years. The inspectors observed a container of boiler chemicals. At the time of the CEI, inspectors observed that an accurate waste determination was not available.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to 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.**

*Box Truck*
AEO maintains one box truck parked on the side of the Warehouse building storing bio-medical waste. The inspectors observed approximately 10 55-gallon containers of bio-medical waste inside the truck.

*150 Poly Deck Way*
AEO indicated that the building is currently occupied by the local government, possibly the local Sheriff's office. The property is secured by a fence and locked gate. The inspectors observed a large building with a sign on the front of the building with the words "Advanced Environmental Options, Inc". The property consists of some asphalt paving and unpaved soil and gravel, with a concrete pad in the rear of the property. The inspectors observed a disconnected aboveground tank on the concrete pad behind the building that did not appear to be in use (Photographs 74 and 76). The inspectors observed a trailer storing 55-gallon containers (Photographs 83, 84, 85, 86, and 87). AEO representatives indicated the containers were empty. AEO representatives indicated approximately 1,500 to 2,000 containers were shipped off-site for recycling in July and August 2022. AEO representatives indicated no records of the container shipments were available. The inspectors observed staining on the concrete pad (Photographs 69, 70, 71, 74, 75, and 76), on the soil and gravel (Photographs 71, 72, 73, 77, 78, 79, 80, 86 through 92), a pile of unknown residue on the ground (Photographs 79, 81, and 82), and a pile of scrap metal on the

ground near the trailer (Photographs 83, 84, and 85). The inspectors observed no other vehicles on the property.

## 12) Records Review

David W. Hitchens arrived at the facility and joined the inspectors during the records review.

The inspectors provided a handout with a written list of the records for review during the opening conference. The inspectors requested that some records be provided for three years. The inspectors requested to review the hazardous waste manifest records, land disposal restriction records (LDRs), universal waste records, 10-day transfer facility records, hazardous waste personnel training records, DOT training records, contingency plan, quick reference guide (QRG), financial records, weekly container inspections records, waste determination records, including waste profiles, SDSs, and analytical reports.

*RCRA Site Notification Form (EPA Form 8700-12)*

AEO submitted a RCRA Site Identification Form, 8700-12, of its regulated waste activity to SCDES, on January 15, 2009, notifying as not a generator of hazardous waste, a hazardous waste transporter and a large quantity handler of universal waste batteries, lamps, pesticides, and mercury containing equipment. AEO representatives indicated to inspectors at the time of the inspection they were a very small quantity generator (VSQG) of hazardous waste.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.13(a) [40 C.F.R. § 262.13(a)], a generator who either generates acute hazardous waste or non-acute hazardous waste in a calendar month shall determine its generator category for that month by doing the following:**

**(1) Counting the total amount of hazardous waste generated in the calendar month; and**

**(2) Subtracting from the total any amounts of waste exempt from counting as described in paragraphs (c) and (d) of this section; and (3) Determining the resulting generator category for the hazardous waste generated using Table 1 of this section.**

*Hazardous Waste Manifests*

The inspectors requested to review the previous three years of manifest records and the 10-day transfer facility records. The hazardous waste manifests and the land disposal restriction (LDR) records for the 10-day transfer facility and for the warehouse container storage locker were reviewed from September 2022 to May 2024. Hazardous waste is transported by Tradebe Transport, LLC (INR000123497) and Maumee Express, Inc (NJD986607380) to the designated facilities Tradebe (TND000772186) and to DLD (MID092947928).

AEO maintains the 10-day transfer facility records electronically and provided inspectors a spreadsheet titled “Tradebe – Columbia, SC”.

The spreadsheet included the “Generator”, “Job #”, “Manifest #”, “Pcs”, “Type”, “In Date”, “Sent for Approval”, “Approval #”, “UN/NA #”, “Haz Class”, and “Wt (P or G)”. A total of 54 “Pcs” with a “Wt” of 24,102 (P or G) were observed on the spreadsheet.

On June 18, 2024, AEO emailed the EPA the 10-day transfer facility spreadsheet and the inbound hazardous waste manifests for the containers stored at AEO.

The inspectors reviewed the records for hazardous waste transported by AEO from its customers to its 10-day transfer facility. The inspectors observed approximately 45 containers of hazardous waste were stored in the 10-day transfer facility on the dates ranging from April 4, 2024, to June 6, 2024. The inspectors observed a total of nine containers of hazardous waste were stored in the 10-day transfer facility on the date June 11, 2024.

**Pursuant to the Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) as amended [Section 3005 of RCRA, 42 U.S.C. § 6925], owners and operators of treatment, storage and disposal facilities shall obtain a permit for the treatment, storage, and disposal of hazardous waste before first treating, storing, or disposing of hazardous waste.**

The inspectors reviewed the manifests for hazardous waste transported by AEO from its customers to its facility for storage in the Storage Locker. The inspectors reviewed the manifests for; Celligent Diagnostics, manifest number 016968999FLE AEO inbound date of March 28, 2023; T-Mobile, manifest number 016968994FLE inbound date of March 9, 2023; manifest number 016968854FLE inbound date of May 21, 2024; manifest number 016968976FLE inbound date of May 14, 2024; Nippon Carbide, manifest number 016969239FLE; Ameresco Palmetto LLC, manifest number 016968858FLE inbound date of May 15, 2024; and South Carolina Law Enforcement Division, manifest number 016968979FLE inbound date of April 18, 2024. It appears that the hazardous waste on the manifests reviewed by inspectors has not been shipped to a designated facility.

**Pursuant to the Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) as amended [Section 3005 of RCRA, 42 U.S.C. § 6925], owners and operators of treatment, storage and disposal facilities shall obtain a permit for the treatment, storage, and disposal of hazardous waste before first treating, storing, or disposing of hazardous waste.**

*Non-Hazardous Waste Manifest*

The inspectors requested to review non-hazardous waste manifests or bill of lading records for wastewater transported to AEO for storage in the 8,000-gallon AST. The inspectors reviewed the non-hazardous waste manifests for the bulk transport of 1,810- gallons of water and hydraulic oil generated by Ply Gem on May 2, 2024, for 5,004-gallons of wastewater sludge generated by R&E Automated, and for 1,750-gallons of water and oil generated by Tuffaloy Products.

*Universal Waste Records*

The inspectors reviewed a bill of lading for universal waste lamps and ballasts shipped to Lighting Resource, LLC., on August 8, 2023. The inspectors reviewed a bill of lading for punctured aerosol cans shipped to ESS Metal Recycling, on November 9, 2023.

The inspectors reviewed AEO's spreadsheet that identified the date the universal waste batteries, lamps, mercury containing equipment, and E-scrap was stored. The log had dates that showed universal waste had not been accumulated for more than one year.

On June 18, 2024, AEO emailed the EPA the universal waste spreadsheet that identified the dates universal waste batteries, lamps, mercury containing equipment, and E-scrap was stored.

*Waste Determination/Profiles/Safety Data Sheets*

AEO waste profiles the waste stream by using the generator's knowledge of the hazard characteristic of the waste stream, the generator process, the materials used in the process, and safety data sheets (SDS) to document the waste determination. AEO representatives indicated that sampling and laboratory testing is conducted when limited information is known of the generator waste stream.

The inspectors reviewed the waste profile and the SDS for unused hazardous material from Pureon Company, labeled as environmentally hazardous substance, liquid, NOS (pentaerythritol tetra (mercaptopropionate)), for waste glycol solids and glycol liquids (Auriga Polymers, Inc), for waste oil and debris (Que Medical QMD), for waste paint and rags (Anderson University Theater), for waste lab pack material (Anderson University Theater), for waste potasium hydroxide and water (William Barnett and Sons, LLC), for liquid formaldehyde (Celligent Diagnostic), for waste non-DOT non-RCRA material (Old Castle ARG), for waste paint thinner and rags (Converse College), for oil and sludge (MOCOM), for oil, sludge, and detergent (Total Clean), and for universal waste lead acid batteries. At the time of the CEI, a waste analysis plan was not available.

*Contingency Plan*

The inspectors requested to review the contingency plan (Plan). The inspectors observed the Plan listed the emergency contacts as; the EPA, the National Response Center, the SCDES Emergency Response, the City of Spartanburg Fire department, the City of Spartanburg Fire Marshall, Emergency Management Services, and the Spartanburg Sanitary Sewer District. The inspectors observed the Plan was not dated. David W. Hitchens was listed first in the Plan but not as the primary emergency coordinator. Vince Goldner was also listed as an emergency coordinator, but it was not clear if he was a primary or alternate emergency coordinator. The inspectors observed the Plan did not describe the arrangements with the local authorities, and the Plan did not describe the location of emergency equipment.

The inspectors observed that records were not maintained by AEO demonstrating the contingency plan was sent to the local authorities.

*Quick Reference Guide (QRG)*

The inspectors requested to review the QRG. At the time of the CEI, a QRG was not available.

*Container Inspection Records*

The inspectors requested to review the container inspection records. AEO provided container inspection records from March 24, 2023, to June 18, 2024. There were no container inspection records prior to March 24, 2023. The inspectors observed the container inspection records titled "AEO Inspection Sheet, HAZ Locker/Drums/ Totes". The container inspection records list the inspection date, the inspector name, in compliance (Yes/No), Faults, and Action Taken. AEO did not document if there were any Faults or Actions Taken on any of the container inspection records. AEO representatives indicated the inspection is conduced daily. The inspectors reviewed the container inspection records and observed from March 8 to March 20, AEO did not document the year of the inspection. The inspectors observed from the container inspection records that from March 8 to April 14, 2023, the inspection was conducted from every day to about every fifth day. The inspectors observed a gap in the container inspection records from April 15, 2023, to March 25, 2024, where AEO did not document an inspection. The inspectors observed from the container inspection records that from March 26 to June 18, 2024, the inspection was conducted from every day to about every third to fourth day.

*Personnel Training*

The inspectors requested to review the RCRA personnel training and training records. Vince Goldner and David W. Hitchens give the personnel training. AEO provided training sign in sheets for 40-hour HAZWOPER, Universal Waste Aerosol Puncture, and DOT Hazard/HAZMAT training. The sign in sheets document the course title, name, signature, and company of the employee taking the training. The sign in sheet for the 40-hour HAZWOPER and DOT Hazard/HAZMAT training has a summary of the training course. Vince Goldner gave 40-hour HAZWOPER training in 2024, 2023, and 2022. AEO gave 40-hour HAZWOPER training to Austin Balltzglier, Shane Owen, and Brian Tune from March 11, 2024, to March 14, 2024. AEO gave 40-hour HAZWOPER training to LaTauja Bostic, Robbie Jones, Frankie Jones, Chasman Wilson, Java Smith and David Welch on January 9, 2023, to January 17, 2023. AEO gave 40-hour HAZWOPER training to Joshua Thompson, Georgina Davis, Jack Greer, Zio'yiona Cheeks, Robert Branch, Dean Smith, Aleix Van Bortel, Daniel Nodine, and Adam Hitchens from January 3, 2022, to January 6, 2022.

Vince Goldner was given 8-hour HAZWOPER refresher training on February 1, 2019, and May 19, 2016.

David W. Hitchens gave DOT Hazard/HAZMAT and Universal Waste Aerosol Puncture training to employees in 2023 and 2022. AEO gave DOT/Hazard training to several employees on January 3, and January 4, 2023. AEO gave DOT HAZMAT training to several employees on January 3, 2022, February 2, 2022, and December 5, 2022. AEO gave Universal Waste Aerosol Puncture training to several employees on January 6, 2022.

The inspectors requested records for Vince Goldner and David W. Hitchens that documented the training or job experience required under paragraphs (a), (b), and (c) of this section was given to, and completed by, them. At the time of the CEI, the records were not available.

*Personnel Training Records*
The inspectors requested to review the RCRA employee job title and job description associated with the employee trained. At the time of the CEI, the records were not available.

## 13) Closing Conference

The inspectors conducted a closing conference with David W. Hitchens, Vince Goldner, and Victor R. Goldner. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

## 14) Sampling Overview

On December 10-12, 2024, the U.S. EPA's National Enforcement Investigations Center (NEIC) conducted a sampling investigation of waste stored in tanks and containers at the AEO facility on 25 Stan Perkins Road. This sampling investigation included a visual assessment and inventory of waste containers stored on site and sampling of wastes stored in tanks and containers on-site. The waste samples that were collected are currently being analyzed for RCRA characteristics and a separate report from NEIC will be provided once laboratory analysis has concluded.

## 15) Summary of Observations

**Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to 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.**

At the time of the CEI, inspectors observed that an accurate waste determination was not available for wastes observed in the laboratory, staining on the ground surrounding the 20-cubic yard containers of clean up waste in the Gravel Yard, and a container of boiler chemicals in the Boiler Ares which has not been used in 10 years.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.13(a) [40 C.F.R. § 262.13(a)], a generator who either generates acute hazardous waste or non-acute hazardous waste in a calendar month shall determine its generator category for that month by doing the following:**

**(1) Counting the total amount of hazardous waste generated in the calendar month; and**
**(2) Subtracting from the total any amounts of waste exempt from counting as described in paragraphs (c) and (d) of this section; and (3) Determining the resulting generator**

**category for the hazardous waste generated using Table 1 of this section.**

AEO submitted a RCRA Site Identification Form, 8700-12, of its regulated waste activity to SCDES, on January 15, 2009, notifying as not a generator of hazardous waste, a hazardous waste transporter and a large quantity handler of universal waste batteries, lamps, pesticides, and mercury containing equipment. AEO representatives indicated to inspectors at the time of the inspection they were a very small quantity generator (VSQG) of hazardous waste.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.**

The inspectors observed the lid of the aerosol can puncturing device was open exposing the container's open bung hole.

**Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: The words "Hazardous Waste".**

The inspectors observed the 55-gallon container attached to the aerosol can puncturing device was not marked or labeled with the words "Hazardous Waste".

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

The inspectors observed the 55-gallon container attached to the aerosol can puncturing device was not marked or labeled with an indication of the hazards.

**Pursuant to S.C. Code Ann. Regs. 61-79.263.12(a) [40 C.F.R. § 263.12(a)], a transporter who stores manifested shipments of hazardous waste in containers meeting the independent requirements of § 262.30 of this chapter at a transfer facility for a period of ten (10) days or less is not subject to regulation under parts 264, 265, 267, 268, and 270 of this chapter with respect to the storage of those wastes.**

At the time of the CEI, the inspectors observed that AEO was storing hazardous waste for more than 10 days at the Outdoor 10-day Transfer Facility and the Warehouse Extended 10-day Transfer Facility.

**Pursuant to the Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) as amended [Section 3005 of RCRA, 42 U.S.C. § 6925], owners and operators of treatment, storage and disposal facilities shall obtain a permit for the treatment, storage, and disposal of hazardous waste before first treating, storing, or disposing of hazardous waste.**

At the time of the CEI, the inspectors observed that AEO was storing hazardous waste, which requires a RCRA Permit and compliance with the RCRA requirements.

The inspectors reviewed the records for hazardous waste transported by AEO from its customers to its 10-day transfer facility. The inspectors observed approximately 45 containers of hazardous waste were stored in the 10-day transfer facility on the dates ranging from April 4, 2024, to June 6, 2024. The inspectors observed a total of nine containers of hazardous waste were stored in the 10-day transfer facility on the date June 11, 2024.

The inspectors reviewed the manifests for hazardous waste transported by AEO from its customers to its facility for storage in the Storage Locker. The inspectors reviewed the manifests for; Celligent Diagnostics, manifest number 016968999FLE AEO inbound date of March 28, 2023; T-Mobile, manifest number 016968994FLE inbound date of March 9, 2023; manifest number 016968854FLE inbound date of May 21, 2024; manifest number 016968976FLE inbound date of May 14, 2024; Nippon Carbide, manifest number 016969239FLE; Ameresco Palmetto LLC, manifest number 016968858FLE inbound date of May 15, 2024; and South Carolina Law Enforcement Division, manifest number 016968979FLE inbound date of April 18, 2024. It appears that the hazardous waste on the manifests reviewed by inspectors has not been shipped to a designated facility.

**Pursuant to S.C. Code Ann. Regs. 61-79.273.33(d)(1) [40 C.F.R. § 273.33(d)(1)], a large quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows: A large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.**

The inspectors observed one container storing lamps labeled with the words universal waste and marked with the date May 24, 2024. The inspectors observed the container was wrapped in green tape and was not closed (Photographs 11, 12, 13, and 14).

**Pursuant to S.C. Code Ann. Regs. 61-79.279.22(c)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."**

Light vehicle maintenance is conducted from the shop generating used oil. The inspectors observed a 250-gallon tote storing used oil with the word "used" ripped from the used oil label (Photograph 68).

**16) List of Appendices**

Attachment 1 – Photograph Log

**17) Signed**

KAYLA ACOSTA Digitally signed by KAYLA ACOSTA
Date: 2025.02.20 12:53:38 -05'00'

Kayla Acosta
Physical Scientist

**18) Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2025.02.20 16:58:31 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

**ATTACHMENT 1: PHOTOGRAPH LOG**

**ADVANCED ENVIRONMENTAL OPTIONS, INC.**

**SPARTENBURG, SOUTH CAROLINA**

**COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS**

**JUNE 18, 2024**

**Photographs taken by Kayla Acosta**


| | | | |
|---|---|---|---|
| Advanced Environmental Options, Inc. | | | IMG-20240618100753753646 57.jpg |
| 06/18/2024 10:07 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Laboratory – Photograph 1 | | | 35.03338891, -81.87327436 |
| The inspectors observed two five-gallon containers of AZZ Sludge NaOH. One container had approximately one gallon. | | | |

| | | | |
|---|---|---|---|
| Advanced Environmental Options, Inc. | | | IMG-20240618101212121256802.jpg |
| 06/18/2024 10:12 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Laboratory – Photograph 2 | | | 35.03338827, -81.87326973 |
| In a side laboratory, the inspectors observed several containers of laboratory chemicals, chemical solutions, and possible samples in a flammable cabinet | | | |

| | | | |
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| Advanced Environmental Options, Inc. | | | IMG-20240618101215121557147.jpg |
| 06/18/2024 10:12 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Laboratory – Photograph 3 | | | 35.03338843, -81.8732697 |
| In a side laboratory, the inspectors observed several containers of laboratory chemicals, chemical solutions, and possible samples in a flammable cabinet. | | | |


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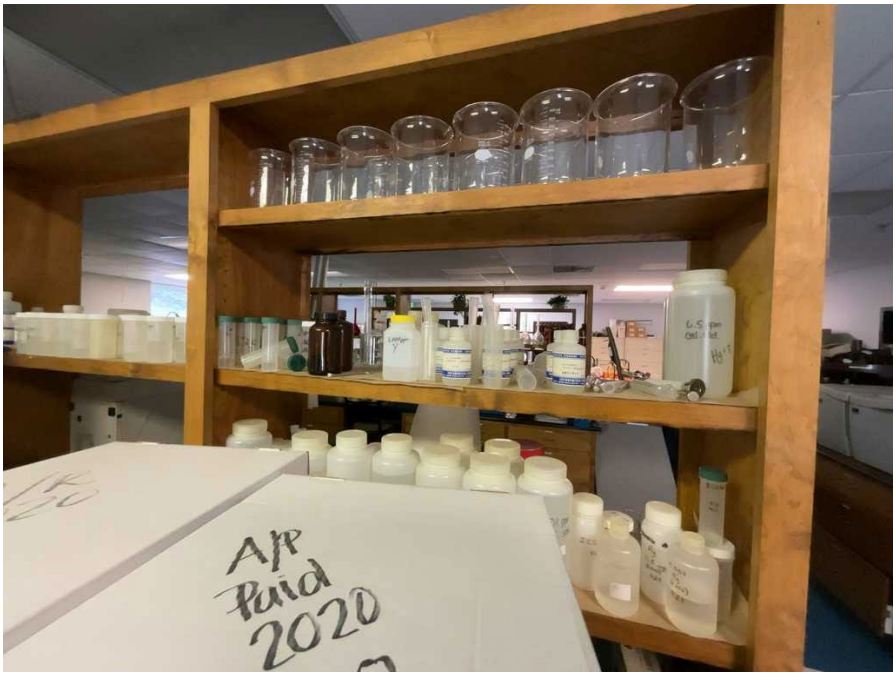
| Advanced Environmental Options, Inc. | | | IMG-20240618101500150174925 6.jpg |
| 06/18/2024 10:15 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Laboratory – Photograph 4 | | | 35.03338716, -81.87326931 |
| In a second side laboratory the inspectors observed several containers of laboratory chemicals, chemical solutions, and unknown liquids on a mobile cart. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618101621162116211807997.jpg |
| 06/18/2024 10:16 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Laboratory – Photograph 5 | | | 35.03338736, -81.8732701 |
| Near the rear of the laboratory on a shelf the inspectors observed several 100 milliliter bottles of chemical standards containing the metals arsenic, barium, cadmium, selenium, or silver in two percent nitric acid. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618101629162916291447921.jpg |
| 06/18/2024 10:16 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Laboratory – Photograph 6 | | | 35.03338698, -81.87326855 |
| Near the rear of the laboratory on a shelf the inspectors observed several 100 milliliter bottles of chemical standards containing the metals arsenic, barium, cadmium, selenium, or silver in two percent nitric acid. On the same shelf the inspectors observed a 0.5-liter bottle of chemical reagent marked with the words “6.5 ppm Cal. Std. Hg”. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618101817181713011 06.jpg |
| 06/18/2024 10:18 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Laboratory – Photograph 7 | | | 35.03338424, -81.87327341 |
| Near the rear of the laboratory on a shelf the inspectors observed several 100 milliliter bottles of chemical standards containing the metals arsenic, barium, cadmium, selenium, or silver in two percent nitric acid. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618101822182212858 75.jpg |
| 06/18/2024 10:18 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Laboratory – Photograph 8 | | | 35.03336987, -81.87321987 |
| Near the rear of the laboratory on a shelf the inspectors observed several 100 milliliter bottles of chemical standards containing the metals arsenic, barium, cadmium, selenium, or silver in two percent nitric acid. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618102528252817082 33.jpg |
| 06/18/2024 10:25 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Universal Waste SAA – Photograph 9 | | | 35.03338754, -81.87327608 |
| The inspectors observed a 55-gallon container on a wooden pallet storing lead acid gel batteries. Material stored on top of container. | | | |


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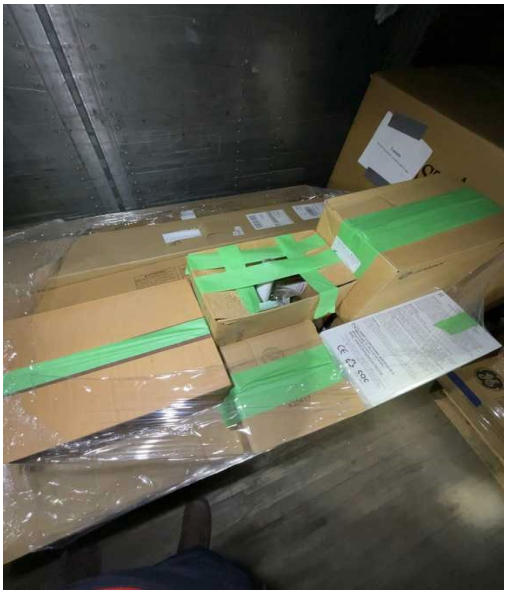
| Advanced Environmental Options, Inc. | | | IMG-20240618102533253317605 93.jpg |
| 06/18/2024 10:25 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Universal Waste SAA – Photograph 10 | | | 35.03338758, -81.87327606 |
| The inspectors observed a 55-gallon container on a wooden pallet storing lead acid gel batteries. Material stored on the floor next to the container. | | | |



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| Advanced Environmental Options, Inc. | | | IMG-20240618103036303618606 77.jpg |
| 06/18/2024 10:30 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Universal Waste Trailer - Photograph 11 | | | 35.03339589, -81.8732666 |
| The inspectors observed one container storing lamps labeled with the words universal waste and marked with the date May 24, 2024. The inspectors observed the container was wrapped in green tape and was not closed. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618103045304519304 79.jpg |
| 06/18/2024 10:30 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Universal Waste Trailer - Photograph 12 | | | 35.03339448, -81.87326153 |
| The inspectors observed one container storing lamps labeled with the words universal waste and marked with the date May 24, 2024. The inspectors observed the container was wrapped in green tape and was not closed. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618103230323020706 41.jpg |
| 06/18/2024 10:32 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Universal Waste Trailer - Photograph 13 | | | 35.03341189, -81.87327022 |
| The inspectors observed one container storing lamps labeled with the words universal waste and marked with the date May 24, 2024. The inspectors observed the container was wrapped in green tape and was not closed. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618103245324519234 71.jpg |
| 06/18/2024 10:32 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Universal Waste Trailer - Photograph 14 | | | 35.0333925, -81.87326637 |
| The inspectors observed one container storing lamps labeled with the words universal waste and marked with the date May 24, 2024. The inspectors observed the container was wrapped in green tape and was not closed. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618104200420232412 1.jpg |
| 06/18/2024 10:42 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Aerosol Can Area – Photograph 15 | | | 35.03338549, -81.87327508 |
| The inspectors observed the container was not closed, was not marked, or labeled with the words hazardous waste, and not marked or labeled with an indication of the hazards. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618104207427237809 7.jpg |
| 06/18/2024 10:42 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Aerosol Can Area - Photograph 16 | | | 35.03338554, -81.87327479 |
| The inspectors observed the container was not closed, was not marked, or labeled with the words hazardous waste, and not marked or labeled with an indication of the hazards. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618104358435818091 12.jpg |
| 06/18/2024 10:43 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Aerosol Can Area - Photograph 17 | | | 35.03338491, -81.87327452 |
| The inspectors observed the container was not closed, was not marked, or labeled with the words hazardous waste, and not marked or labeled with an indication of the hazards. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618105228522822454 81.jpg |
| 06/18/2024 10:52 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Area – Photograph 18 | | | 35.03338558, -81.87327473 |
| The inspectors observed 200 to 300 55-gallon containers and totes stored. The inspectors observed eight five-gallon containers of unused hazardous material from Pureon Company and several containers of unused environmentally hazardous substance, liquid, NOS. Solids and liquids managed as non-hazardous waste and consolidated and shipped to AEO 3 to be solidified. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618105432543223452O4.jpg |
| 06/18/2024 10:54 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Area – Photograph 19 | | | 35.03338505, -81.87327373 |
| The inspectors observed 200 to 300 55-gallon containers and totes stored. The inspectors observed eight five-gallon containers of unused hazardous material from Pureon Company and several containers of unused environmentally hazardous substance, liquid, NOS. Solids and liquids managed as non-hazardous waste and consolidated and shipped to AEO 3 to be solidified. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618105709579174375 3.jpg |
| 06/18/2024 10:57 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Area – Photograph 20 | | | 35.03338537, -81.87327478 |
| The inspectors observed 200 to 300 55-gallon containers and totes stored. The inspectors observed several containers of non-hazardous waste. Solids and liquids managed as non-hazardous waste and consolidated and shipped to AEO 3 to be solidified. | | | |


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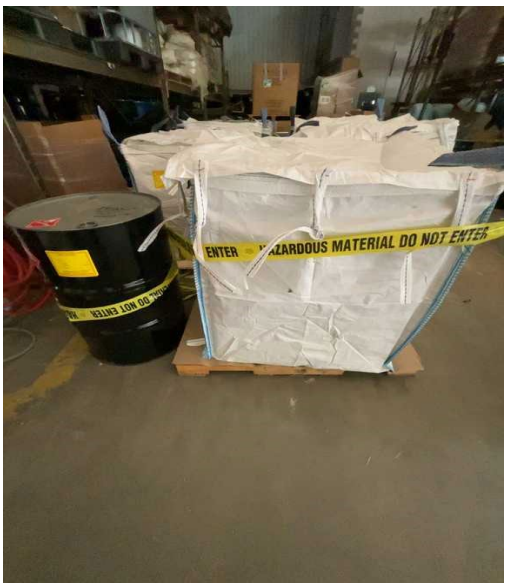
| Advanced Environmental Options, Inc. | | | IMG-20240618105715571515803 44.jpg |
| 06/18/2024 10:57 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Area – Photograph 21 | | | 35.03338546, -81.87327477 |
| The inspectors observed 200 to 300 55-gallon containers and totes stored. The inspectors observed several containers of non-hazardous waste. Solids and liquids managed as non-hazardous waste and consolidated and shipped to AEO 3 to be solidified. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618110226226251369 1.jpg |
| 06/18/2024 11:02 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Extended 10- Day Transfer Facility – Photograph 22 | | | 35.03338915, -81.87327041 |
| The inspectors did not observe spill kits or emergency equipment located near the storage area. The inspectors did not observe “no smoking” signs posted in this area from ignitable or reactive waste. Not maintaining aisle space. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618111058105819771 61.jpg |
| 06/18/2024 11:10 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Extended 10- Day Transfer Facility – Photograph 23 | | | 35.03338894, -81.87326484 |
| The inspectors observed approximately 19 55-gallon and six one-cubic yard sacks storing hazardous waste. The sacks were labeled with a miscellaneous class 9 hazard indicator and not cler marked with a date. The inspectors observed approximately five 55-gallon containers were marked with the date June 11, 2024. The inspectors observed one 55-gallon container of hazardous waste was marked with the generator date of March 14, 2024, and marked with the transporter date of June 6, 2024. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618111103113204848 2.jpg |
| 06/18/2024 11:11 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Extended 10- Day Transfer Facility – Photograph 24 | | | 35.03339031, -81.87326506 |
| The inspectors observed approximately 19 55-gallon and six one-cubic yard sacks storing hazardous waste. The sacks were labeled with a miscellaneous class 9 hazard indicator and not cler marked with a date. The inspectors observed approximately five 55-gallon containers were marked with the date June 11, 2024. The inspectors observed one 55-gallon container of hazardous waste was marked with the generator date of March 14, 2024, and marked with the transporter date of June 6, 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618111110711726124l8.jpg |
| 06/18/2024 11:11 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Extended 10- Day Transfer Facility – Photograph 25 | | | 35.03338988, -81.87326498 |
| The inspectors observed six one-cubic yard sacks were labeled with a miscellaneous class 9 hazard indicator and not clearly marked with a date. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618111142114218564 53.jpg |
| 06/18/2024 11:11 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Extended 10- Day Transfer Facility – Photograph 26 | | | 35.03338818, -81.87326383 |
| The inspectors observed approximately five 55-gallon containers were marked with the date June 11, 2024. The inspectors observed one 55-gallon container of hazardous waste was marked with the generator date of March 14, 2024, and marked with the transporter date of June 6, 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618111147114720815 15.jpg |
| 06/18/2024 11:11 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Extended 10- Day Transfer Facility – Photograph 27 | | | 35.03338891, -81.87326457 |
| The inspectors observed approximately five 55-gallon containers were marked with the date June 11, 2024. The inspectors observed one 55-gallon container of hazardous waste was marked with the generator date of March 14, 2024, and marked with the transporter date of June 6, 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618111151115120504 05.jpg |
| 06/18/2024 11:11 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Extended 10- Day Transfer Facility – Photograph 28 | | | 35.03338828, -81.87326927 |
| The inspectors observed approximately five 55-gallon containers were marked with the date June 11, 2024. The inspectors observed one 55-gallon container of hazardous waste was marked with the generator date of March 14, 2024, and marked with the transporter date of June 6, 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618111203123236472 3.jpg |
| 06/18/2024 11:12 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Extended 10- Day Transfer Facility – Photograph 29 | | | 35.03338622, -81.87327195 |
| The inspectors observed approximately six one-cubic yard sacks storing hazardous waste labeled with a miscellaneous class 9 hazard indicator and not clearly marked with a date. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618111509159174610 5.jpg |
| 06/18/2024 11:15 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse South of Extended 10-Day Transfer Facility – Photograph 30 | | | 35.03338921, -81.87326734 |
| The inspectors observed two 55-gallon containers labeled with the words non-hazardous waste generated by Broad River Energy Center. One container was storing motor oil and rags and the second container was storing oil rags and pads, marked with the date May 16, 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618111515151515221739 5.jpg |
| 06/18/2024 11:15 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse South of Extended 10-Day Transfer Facility – Photograph 31 | | | 35.03338923, -81.87326735 |
| The inspectors observed two 55-gallon containers labeled with the words non-hazardous waste generated by Broad River Energy Center. One container was storing motor oil and rags and the second container was storing oil rags and pads, marked with the date May 16, 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618112503253184093 2.jpg |
| 06/18/2024 11:25 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Locker - Photograph 32 | | | 35.03339992, -81.87327427 |
| The inspectors observed signage posted on the exterior wall of the storage locker that included DOT placards and a no smoking sign. The inspectors did not observe spill kits or emergency equipment located near the storage area. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618112903293170486 3.jpg |
| 06/18/2024 11:29 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Locker - Photograph 33 | | | 35.03340001, -81.87327789 |
| The inspectors could not inspect each container because of the number of containers and the lack of aisle space in the storage locker Photograph 34. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618112917291715685 17.jpg |
| 06/18/2024 11:29 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Locker - Photograph 34 | | | 35.0333898, -81.87326978 |
| The inspectors could not inspect each container because of the number of containers and the lack of aisle space in the storage locker. The inspectors observed one five-gallon container labeled with the words hazardous waste (D001, D002, F002, F003), labeled with a flammable and corrosive indication of the hazards, and not marked with a date. | | | |


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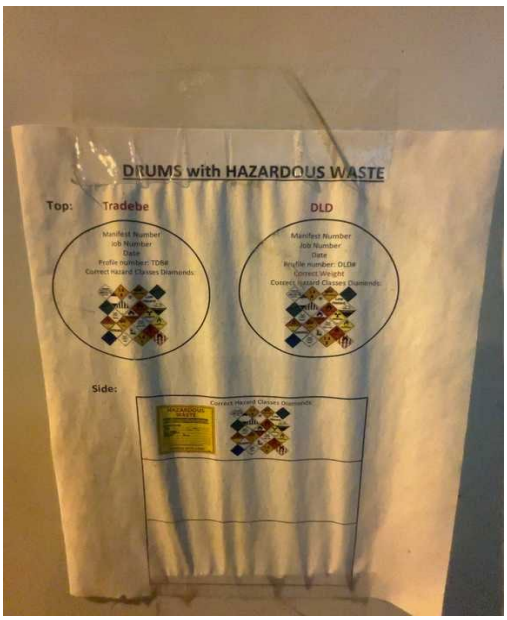
| Advanced Environmental Options, Inc. | | | IMG-20240618113114311411976 36.jpg |
| 06/18/2024 11:31 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Locker – Photograph 35 | | | 35.03338901, -81.87327898 |
| The inspectors observed one five-gallon container labeled with the words hazardous waste (D001, D002, F002, F003), labeled with a flammable and corrosive indication of the hazards, and not marked with a date. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618113206326235578 1.jpg |
| 06/18/2024 11:32 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Container Storage Locker - Photograph 36 | | | 35.03338568, -81.87327522 |
| The inspectors observed information marked or labeled on containers of hazardous waste shipped to Tradebe Treatment and Recycling of TN, LLC (Tradebe) and to Drug and Laboratory Disposal Environmental Services, Inc. (DLD), posted on the storage locker. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618113843384321229 70.jpg |
| 06/18/2024 11:38 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Mezzanine Container Storage/Wastewater Holding Area – Photograph 37 | | | 35.03342541, -81.8732762 |
| AEO representatives indicated approximately 350 to 400 55-gallon containers and totes were stored in this area. The inspectors observed the containers were labeled with the words non-RCRA regulated waste or non-hazardous waste and closed. The inspectors observed a 55-gallon container (MOCOM) was covered with dried material on its exterior surface. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618113849384919978 84.jpg |
| 06/18/2024 11:38 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/ Outdoor Mezzanine Container Storage/Wastewater Holding Area - Photograph 38 | | | 35.03341133, -81.87327003 |
| AEO representatives indicated approximately 350 to 400 55-gallon containers and totes were stored in this area. The inspectors observed the containers were labeled with the words non-RCRA regulated waste or non-hazardous waste and closed. The inspectors observed a 55-gallon container (MOCOM) was covered with dried material on its exterior surface. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618114052405225560 79.jpg |
| 06/18/2024 11:40 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Mezzanine Container Storage/Wastewater Holding – Photograph 39 | | | 35.03339299, -81.87325745 |
| The inspectors observed a 55-gallon container labeled with the words non-hazardous waste storing oil and sludge generated by MOCOM, waste profile PROF015942. The container was covered with dried material on its exterior surface. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618114113411321348 65.jpg |
| 06/18/2024 11:41 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Wastewater Holding Area – Outside - (Photograph 40 | | | 35.03339299, -81.87325745 |
| The inspectors observed two 250-gallon totes storing possible glue/adhesive with the hazardous waste labels and corrosive hazard indicator covered with black spray paint. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618114146414620395 66.jpg |
| 06/18/2024 11:41 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Mezzanine Container Storage/Wastewater Holding – Photograph 41 | | | 35.03336233, -81.87321049 |
| AEO representatives indicated approximately 350 to 400 55-gallon containers and totes were stored in this area. The inspectors observed the containers were labeled with the words non-RCRA regulated waste or non-hazardous waste and closed. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618114341434128953 55.jpg |
| 06/18/2024 11:43 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Mezzanine Container Storage/Wastewater Holding – Photograph 42 | | | 35.03342505, -81.87326764 |
| AEO representatives indicated approximately 350 to 400 55-gallon containers and totes were stored in this area. The inspectors observed the containers were labeled with the words non-RCRA regulated waste or non-hazardous waste and closed. Empty containers. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618114346434630322 96.jpg |
| 06/18/2024 11:43 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Mezzanine Container Storage/Wastewater Holding – Photograph 43 | | | 35.03342505, -81.87326764 |
| The inspectors observed the containers and totes outside the concrete containment pad were empty. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618114413441329690 90.jpg |
| 06/18/2024 11:44 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Mezzanine Container Storage/Wastewater Holding – Photograph 44 | | | 35.03342505, -81.87326764 |
| The inspectors observed the containers and totes outside the concrete containment pad were empty. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618114513451325467 04.jpg |
| 06/18/2024 11:45 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/ Wastewater Treatment Facility – Photograph 45 | | | 35.03342505, -81.87326764 |
| AEO conducts batch treatment of wastewater using oil and water separation, clarification, chemical treatment, and solids retention. The wastewater effluent is discharged to a publicly owned treatment works (POTW). | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618114519451926712 38.jpg |
| 06/18/2024 11:45 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/ Outdoor Mezzanine Container Storage/Wastewater Holding - Photograph 46 | | | 35.03357834, -81.87322411 |
| AEO representative indicated the totes on the second level were empty (Photograph 46). This area was not inspected. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618115053505337558 11.jpg |
| 06/18/2024 11:50 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Aboveground Storage Tank - Photograph 47 | | | 35.03347204, -81.8733194 |
| The outdoor aboveground storage tank (AST) holds about 8,000 gallons and is located across from the WWTF. The inspectors observed the AST appeared to be on a skid, was not marked or labeled and on the ground without secondary containment. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618115111511135407 31.jpg |
| 06/18/2024 11:51 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/ Outdoor Aboveground Storage Tank - Photograph 48 | | | 35.03398081, -81.87310537 |
| The outdoor aboveground storage tank (AST) holds about 8,000 gallons and is located across from the WWTF. The inspectors observed the AST appeared to be on a skid, was not marked or labeled and on the ground without secondary containment. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618115523552343116 45.jpg |
| 06/18/2024 11:55 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Stormwater Pond - Photograph 49 | | | 35.03371268, -81.87318655 |
| The inspectors observed the surface of the stormwater pond covered in algal. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618115529552942460 95.jpg |
| 06/18/2024 11:55 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Stormwater Pond - Photograph 50 | | | 35.03371268, -81.87318655 |
| The inspectors observed the surface of the stormwater pond covered in algal. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618115853585320216l9.jpg |
| 06/18/2024 11:58 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Tote Storage Area – Photograph 51 | | | 35.0337208, -81.87317821 |
| The inspectors observed totes stored on the asphalt approximately 12 rows deep by four rows wide by five rows high. The totes that could be observed appeared empty. | | | |

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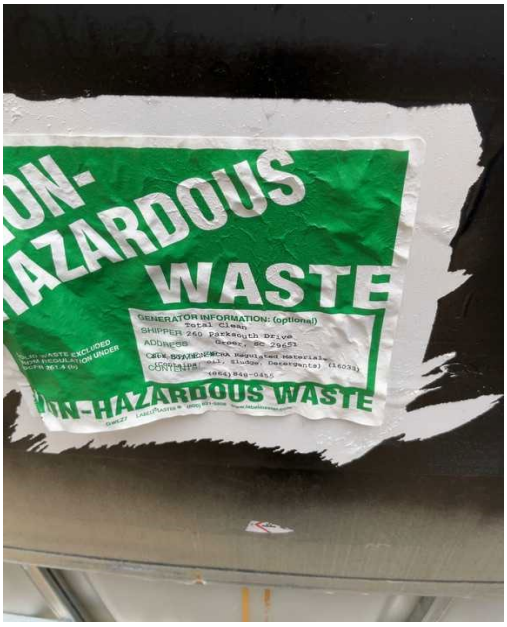
| Advanced Environmental Options, Inc. | | | IMG-20240618120412412245940 7.jpg |
| 06/18/2024 12:04 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Mezzanine Container Storage/Wastewater Holding - Photograph 52 | | | 35.03337116, -81.87323869 |
| The inspectors observed two 250-gallon totes labeled with the words non-hazardous waste storing oil, sludge, detergents generated by Total Clean, waste profile 16033. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618120419419274619 7.jpg |
| 06/18/2024 12:04 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor Mezzanine Container Storage/Wastewater Holding - Photograph 53 | | | 35.03337192, -81.87321465 |
| The inspectors observed two 250-gallon totes labeled with the words non-hazardous waste storing oil, sludge, detergents generated by Total Clean, waste profile 16033. | | | |

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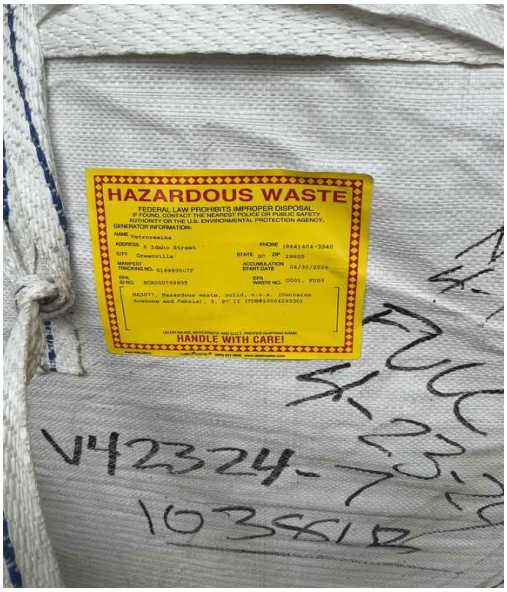
| Advanced Environmental Options, Inc. | | | IMG-20240618120657657323745 9.jpg |
| 06/18/2024 12:06 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor 10-Day Transfer Facility – Photograph 54 | | | 35.03345043, -81.87329149 |
| The inspectors could not inspect each container because of the number of containers and the lack of aisle space in the storage area. The inspectors observed approximately 10 one-cubic yard sacks, two 55-gallon containers, and several five-gallon containers stacked on other containers toward the back of the storage area. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618120703733946183.jpg |
| 06/18/2024 12:07 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor 10-Day Transfer Facility – Photograph 55 | | | 35.03345043, -81.87329149 |
| The inspectors observed two one-cubic yard sacks storing acetone and debris (D001, F003) generated by Vetroresina (SCR000769935), not marked, or labeled with an indication of the hazards and marked with the date April 30, 2024, on the hazardous waste label. The dates “new April 12, 2024” and “full April 23, 2024”, were marked on the sacks. | | | |


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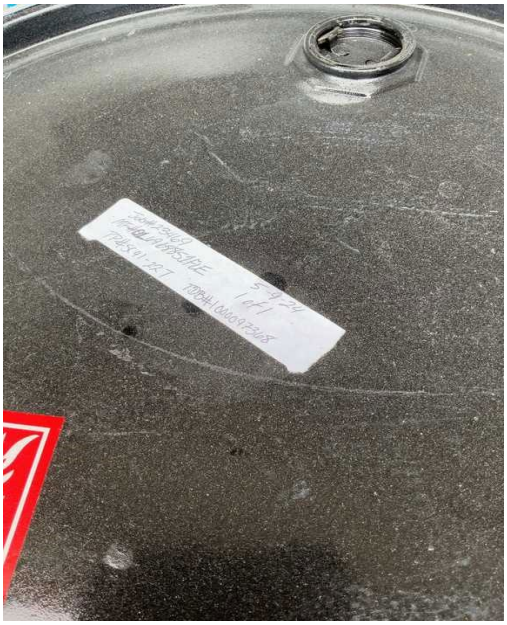
| Advanced Environmental Options, Inc. | | | IMG-20240618120713713294582 4.jpg |
| 06/18/2024 12:07 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor 10-Day Storage Transfer Facility - Photograph 56 | | | 35.03345043, -81.87329149 |
| The inspectors observed one 55-gallon container storing waste xylene (D001, F003) generated by Celligent Diagnostics (NCR000183145) not marked with a date on the hazardous waste label. The inspectors observed the top of the 55-gallon container was marked with the date May 9, 2024. | | | |



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| Advanced Environmental Options, Inc. | | | IMG-20240618120718718680389 5.jpg |
| 06/18/2024 12:07 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor 10-Day Storage Transfer Facility - Photograph 57 | | | 35.03345043, -81.87329149 |
| The inspectors observed one 55-gallon container storing waste xylene (D001, F003) generated by Celligent Diagnostics (NCR000183145) not marked with a date on the hazardous waste label. The inspectors observed the top of the 55-gallon container was marked with the date May 9, 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618120724724344913 8.jpg |
| 06/18/2024 12:07 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor 10-Day Transfer Facility - Photograph 58. | | | 35.03345043, -81.87329149 |
| The inspectors observed two one-cubic yard sacks storing acetone and debris (D001, F003) generated by Vetroresina (SCR000769935), not marked, or labeled with an indication of the hazards and marked with the date April 30, 2024, on the hazardous waste label. The dates “new April 12, 2024” and “full April 23, 2024”, were marked on the sacks. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618121052105215587778.jpg |
| 06/18/2024 12:10 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor 10-Day Transfer Facility – Photograph 59 | | | 35.03345043, -81.87329149 |
| The inspectors observed one 55-gallon container storing waste xylene (D001, F003) generated by Celligent Diagnostics (NCR000183145) not marked with a date on the hazardous waste label. The inspectors observed the top of the 55-gallon container was marked with the date May 9, 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618121500150158286 4.jpg |
| 06/18/2024 12:15 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Outdoor 10-Day Transfer Facility – Photograph 60 | | | 35.03345043, -81.87329149 |
| The 10-day transfer facility is a locked 40-foot Sea and Land container (storage area) located next to the Outdoor Mezzanine Container Storage/Wastewater Holding Area. The inspectors observed a no smoking sign, and signs marked danger hazardous waste storage posted on the exterior of the storage area. The inspectors did not observe spill kits or emergency equipment located near the storage area. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618121830183023539 08.jpg |
| 06/18/2024 12:18 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Gravel Yard – Photograph 61 | | | 35.03345043, -81.87329149 |
| The inspectors observed staining on the ground surrounding the 20-cubic yard containers. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618121850185020354 36.jpg |
| 06/18/2024 12:18 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Gravel Yard – Photograph 62 | | | 35.03345043, -81.87329149 |
| The inspectors observed several 20-cubic yard containers in the gravel yard. The inspectors observed one 20-cubic yard container was storing soil contaminated with gas, oil, and glycol generated from several remediated off-site spills. The contaminated soil was either generated off-site or stored at AEO at least since February 2024. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618121857185718572295216.jpg |
| 06/18/2024 12:18 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Gravel Yard – Photograph 63 | | | 35.03345043, -81.87329149 |
| The inspectors observed staining on the ground surrounding the 20-cubic yard containers. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618121912191219122278121.jpg |
| 06/18/2024 12:19 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Gravel Yard – Photograph 64 | | | 35.03345043, -81.87329149 |
| The inspectors observed staining on the ground surrounding the 20-cubic yard containers. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618121919191924166 77.jpg |
| 06/18/2024 12:19 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Gravel Yard – Photograph 65 | | | 35.03345043, -81.87329149 |
| The inspectors observed staining on the ground surrounding the 20-cubic yard containers. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618121942194224 22388266.jpg |
| 06/18/2024 12:19 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Gravel Yard – Photograph 66 | | | 35.03345043, -81.87329149 |
| The inspectors observed one 20-cubic yard container was storing an unknown material. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618122215721572188791.jpg |
| 06/18/2024 12:21 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Gravel Yard – Photograph 67 | | | 35.03345043, -81.87329149 |
| The inspectors observed several 20-cubic yard containers in the gravel yard. The inspectors observed one 20-cubic yard container was storing soil contaminated with gas, oil, and glycol generated from several remediated off-site spills. The contaminated soil was either generated off-site or stored at AEO at least since February 2024. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618122413241314678 25.jpg |
| 06/18/2024 12:24 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Facility Maintenance Shop – Photograph 68 | | | 35.03345043, -81.87329149 |
| The inspectors observed a 250-gallon tote storing used oil with the word “used” ripped from the used oil label. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124111411120140126.jpg |
| 06/18/2024 12:41 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 69 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the concrete pad and on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124116411620103332.jpg |
| 06/18/2024 12:41 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 70 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the concrete pad and on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124137413724623 45.jpg |
| 06/18/2024 12:41 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 71 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the concrete pad and on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124159415930484 40.jpg |
| 06/18/2024 12:41 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way - Photograph 72 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124206426242242 7.jpg |
| 06/18/2024 12:42 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way - Photograph 73 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124222422226172 57.jpg |
| 06/18/2024 12:42 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 74 | | | 35.03266089, -81.87013619 |
| The inspectors observed a disconnected aboveground tank on the concrete pad behind the building that appeared empty. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124233423333104842.jpg |
| 06/18/2024 12:42 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 75 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the concrete pad and on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124239423926423377.jpg |
| 06/18/2024 12:42 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 76 | | | 35.03266089, -81.87013619 |
| The inspectors observed a disconnected aboveground tank on the concrete pad behind the building that appeared empty. The inspectors observed staining on the concrete pad. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124309439355677 1.jpg |
| 06/18/2024 12:43 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 77 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124329432930905 46.jpg |
| 06/18/2024 12:43 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 78 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124340434031634 61.jpg |
| 06/18/2024 12:43 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 79 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the soil and gravel. The inspectors observed a pile of unknown residue on the ground. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124351435122948 49.jpg |
| 06/18/2024 12:43 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 80 | | | 35.03266089, -81.87013619 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124404444311565 5.jpg |
| 06/18/2024 12:44 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 81 | | | 35.03266089, -81.87013619 |
| The inspectors observed a pile of unknown residue on the ground. The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124410441031249 86.jpg |
| 06/18/2024 12:44 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 82 | | | 35.03266089, -81.87013619 |
| The inspectors observed a pile of unknown residue on the ground. The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124438443823190008.jpg |
| 06/18/2024 12:44 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 83 | | | 35.03266089, -81.87013619 |
| The inspectors observed a trailer storing 55-gallon containers. The inspectors observed and a pile of scrap metal on the ground near the trailer. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124451445130063302.jpg |
| 06/18/2024 12:44 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 84 | | | 35.03266089, -81.87013619 |
| The inspectors observed a trailer storing 55-gallon containers. The inspectors observed and a pile of scrap metal on the ground near the trailer. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124458445827566.jpg |
| 06/18/2024 12:44 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 85 | | | 35.03266089, -81.87013619 |
| The inspectors observed a trailer storing 55-gallon containers. The inspectors observed and a pile of scrap metal on the ground near the trailer. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124530453029179 15.jpg |
| 06/18/2024 12:45 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 86 | | | 35.03266089, -81.87013619 |
| The inspectors observed a trailer storing 55-gallon containers. The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124536453631224 99.jpg |
| 06/18/2024 12:45 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 87 | | | 35.03350527, -81.87027502 |
| The inspectors observed a trailer storing 55-gallon containers. The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124541454129896 95.jpg |
| 06/18/2024 12:45 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 88 | | | 35.03347024, -81.87023746 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124626462627855l8.jpg |
| 06/18/2024 12:46 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 89 | | | 35.03343259, -81.87019709 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124631463126976 37.jpg |
| 06/18/2024 12:46 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 90 | | | 35.03343259, -81.87019709 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124637463733307 94.jpg |
| 06/18/2024 12:46 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 91 | | | 35.03373241, -81.87051855 |
| The inspectors observed staining on the soil and gravel. | | | |

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| Advanced Environmental Options, Inc. | | | IMG-20240618124643464324202 84.jpg |
| 06/18/2024 12:46 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| 150 Poly Deck Way – Photograph 92 | | | 35.03348304, -81.87025118 |
| The inspectors observed staining on the soil and gravel. | | | |


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| Advanced Environmental Options, Inc. | | | IMG-20240618143318331821397 39.jpg |
| 06/18/2024 02:33 PM (ET) | No CBI | No PII | Photographer: Kayla Acosta |
| Stan Perkins Site/Warehouse Aerosol Can Area – Photograph 93 | | | 35.03338831, -81.8732738 |
| The inspectors observed that AEO closed the 55-gallon container and labeled it with the words hazardous waste, and with an indication of the hazards. | | | |

**APPENDIX 2: DOCUMENT LOG**