

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
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2) Facility Information

St. Johns Packaging (USA) LLC
2619 Phoenix Drive
Greensboro, NC 27406

EPA ID#: NCD041747775
NAICS #: 326112 – Plastics Packaging Film and
Sheet (Including Laminated) Manufacturing,
326111 – Plastics Bag and Pouch
Manufacturing

3) Responsible Officials

Craig Bonde
Packaging Innovation Manager
cbonde@sjpack.com

4) Inspection Participants

Craig Bonde, St. Johns Packaging
(USA) LLC
Jeremy Gilbert, St. Johns Packaging
(USA) LLC

Daniel Girdner, NCDEQ
Kayla Acosta, USEPA

5) Date of Inspection

October 17, 2023 at 8:20 AM

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; The North Carolina Solid Waste Management Law, N.C.G.S. § § 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119

Pursuant to 15A NCAC 13A .0102(b) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

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

Pursuant to 15A NCAC 13A .0106(a) [40 C.F.R. § 261.4(a)(8)], secondary materials that are reclaimed and returned to the original process or processes in which they were generated where they are reused in the production process are not solid wastes provided that the conditions listed in 15A NCAC 13A .0106(a) [261.4(a)(8)] (hereinafter referred to as the “Closed-Loop Recycling Exemption”) are met.

Pursuant to 15A NCAC 13A .0106(a) [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in 15A NCAC 13A .0106(a) [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 15A NCAC 13A .0119(a) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine St. Johns Packaging (USA) LLC’s (known hereinafter as SJP) compliance with the applicable requirements of RCRA and the corresponding North Carolina regulations. This was an EPA led inspection.

8) Facility Description

According to SJP’s website, the company is a vertically integrated manufacturer of flexible packaging products that are sold to leading food and consumer product companies. SJP was founded in 1954. The product company markets include bakery, personal care, pet food, and

food products. In 2009 SJP acquired North State Flexibles located in Greensboro, N.C. The Greensboro facility specializes in flex graphic printing with up to 10 color options and polyethylene manufacturing of wicketed bags, laminated material, and pouches. Examples of products include supermarket shelf packaging, pet food packaging, and bakery packaging.

The facility is situated on 133,000 square feet of property. Formerly named North State Flexibles, the facility began operations in 1968 and changed its name to St. Johns Packaging in 2023. The facility is staffed with 120 employees and operates 24 hours a day, seven days a week, with four shifts.

SJP is notified as a LQG of Hazardous Waste. The facility first notified of its regulated waste activities on February 28, 1994, as a LQG and most recently notified on February 23, 2022. Hazardous wastes generated at the facility include EPA Waste Code D001 for flammable liquids which include n-propyl alcohol, n-propyl acetate, and waste ink. The facility uses a solvent distillation unit to recycle spent solvent back into their process through a closed loop system. The facility also generates non-hazardous waste from their LO washout solvent polymer-printing process. Still bottoms from the LO washout recovery unit are managed as non-hazardous waste. Waste profiles and hazardous waste determinations were available for review for this and other waste streams. The facility also generates used oil and universal waste batteries and spent fluorescent bulbs. The facility has a Title V Air Permit # 02221T20 from the NCDEQ Division of Air Quality which is in the process of renewal.

9) Previous Inspection History

NCDEQ has conducted one RCRA CEI at the subject facility between 2018 and 2023. The last inspection was conducted on January 14, 2019. No violations were found.

10) Opening Conference

On October 17, 2023, EPA inspector Kayla Acosta, accompanied by NCDEQ inspector Daniel Girdner, arrived at SJP at approximately 8:20 AM. Craig Bonde, Packaging Innovation Manager immediately received the inspectors. Craig Bonde, and the inspectors were joined by Jeremy Gilbert, Facility Manager for the opening conference. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

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

11) **Inspection Observations**

Printing Press Area:

The facility operates five printing presses. One printing press was not operating at the time of the inspection. Solvent used in the printing presses is managed as hazardous secondary material (HSM) and hard piped into one of two 550-gallon distillation tanks. No hazardous waste was observed in the printing press area.

Tank Farm:

Outside the manufacturing building are two (2) double-walled above-ground storage tanks (ASTs). There is one (1) 4,000-gallon AST used to store HSM solvent labeled "Recycled Solvent" with an NFPA placard and one (1) 8,000-gallon AST used to store fresh solvent labeled "North State Blend" with an NFPA placard (Photo 1). No hazardous waste was observed in this area.

Distillation Room and Satellite Accumulation Area (SAA):

The distillation room is used to recycle spent solvent from the printing press. HSM solvent is hard-piped from the printing press area into one of two (2) 550-gallon double-walled ASTs (Photo 2). Once the HSM passes through the distillation unit, it is stored in a 550-gallon AST labeled "Clean Recycled Solvent Tote" (Photo 3). The inspectors observed two (2) 55-gallon drums of hazardous waste still-bottoms in an SAA (Photo 3). The containers were full and being prepared to be moved to the facility's 90-day central accumulation area (CAA). Both containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.

Just outside the Distillation Room was a 5-gallon container of solvent-contaminated wipes labeled "Used Rags to be Cleaned", which are laundered by the company Aramark. The container was closed and had a flammable liquid placard to indicate the hazard of the content (Photo 4).

Pursuant to 15A NCAC 13A .0106(a) [40 C.F.R. § 261.4(a)(26)(i)], Solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that (i) The solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled "Excluded Solvent-Contaminated Wipes." The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being

transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

After the inspection, Craig Bonde submitted a photo via email showing all containers that store excluded solvent-contaminated rags were re-labeled with the words “Excluded Solvent-Contaminated Wipes”.

Central Accumulation Area (CAA):

SJP manages a hazardous waste CAA inside the manufacturing building. The area was identified with a sign which read “Danger, Hazardous Waste Storage Flammable No Smoking” (Photo 5). The facility manages ignitable waste and non-hazardous waste in this CAA.

The CAA is equipped with an internal communications and alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system (Photo 6).

The inspectors observed the 12 55-gallon drums of hazardous waste n-propanol, n-propyl acetate (D001) being prepared to be shipped off for disposal on the same day. All containers were properly closed, labeled with the words “Hazardous Waste”, dated, and marked with a flammable liquid placard. The oldest date recorded was 09/28/2023 (Photos 7-9). Adequate aisle space was observed.

The inspectors also observed three (3) 55-gallon drums of non-hazardous waste LO Washout Still Bottoms.

Universal Waste Management:

The inspectors observed four (4) cardboard boxes storing used fluorescent bulbs. The containers were not dated; however, the facility maintains shipping documents for universal waste to demonstrate universal waste is not being stored beyond one year as required by 40 C.F.R. § 273.15. The containers were labeled “Mixed Lamps” and were open.

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.13(d)], A small 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: (1) A small 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.

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.14(e)], each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.

The facility representatives re-labeled all four boxes as “Used Lamps” and properly closed the boxes during the inspection (Photo 10).

LO Washout Solvent Polymer Printing Room with Non-Hazardous Distillation Unit:

This area is located inside the manufacturing building. This process involves the manufacturing of a LO washout solvent polymer printing plate which gets imaged and etched. Whatever is not imaged gets washed away and recovered in a distillation unit for LO Washout. The still bottom waste that is generated from the distillation unit has been determined to be non-hazardous through analytical testing by Southern Logistics. Records were available for review.

Maintenance Shop:

Near the maintenance shop entrance, the inspectors observed one (1) 55-gallon container storing used oil. The container was closed and labeled “Used Oil” (Photo 11).

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility’s Integrated Contingency and Emergency Action Plan, which was last updated on 01/25/2023.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with the local emergency response and the Local Emergency Planning Committee. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Current emergency coordinators are listed in the facility’s Quick Reference Guide (QRG). The primary emergency coordinator was listed as Nick Pace who is no longer with the company. The facility did list current alternates.

Pursuant to 15A NCAC 13A .0107(i) [40 C.F.R. § 262.261(d)], the plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see § 262.264), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. In situations where the generator facility has an emergency coordinator continuously on duty because it operates 24 hours per day, every day of the year, the plan may list the staffed position (e.g., operations manager, shift coordinator, shift operations supervisor) as well as an emergency telephone number that can be guaranteed to be answered at all times.

On 11/10/2023, Craig Bonde submitted an updated Contingency Plan which included Jeremy Gilbert and Craig Bonde as the primary and alternate emergency coordinators.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the Integrated Contingency and Emergency Action Plan (and its quick reference guide) was most recently submitted to the Local Emergency Planning Committee on 02/27/2023.

The QRG includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

The QRG contained a map of the facility showing evacuation routes; however, the map was missing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes and a street map of the facility in relation to surrounding businesses, schools and residential areas.

Pursuant to 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)(4-5)], A large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements:

(4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes.

(5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers.

Craig Bonde submitted these maps along with the updated QRG and contingency plan via email on 11/10/2023.

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for Press Manager, Pressman 1, Plate Maker Press Assistant, Shipment/ Receiving Lead, Press Supervisor, and Facility Technician. Each description included the requisite skill, education, or

other qualifications, and duties of facility personnel assigned to that position. The facility provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above.

The inspectors reviewed records of employee hazardous waste training completed in 2021, 2022, 2023. It appeared that the facility failed to provide annual refresher training by the anniversary dates for four (4) employees with hazardous waste management responsibilities, with 413 days between the date of inspection on October 17, 2023, and the previous training record on August 30, 2022 (exceeding the 365-day period by 48 days). There were 397 days between the last training on August 30, 2022, and the previous year on July 29, 2021 (exceeded the 365-day period by 32 days).

Name	Title	Inspection Date	Last Training	Prior Training	Total Days in 2023	Total Days in 2022
Tim Southard	Shipper/Receiver	10/17/2023	8/30/2022	7/29/2021	413	397
Rich Campbell	Shipper/Receiver	10/17/2023	8/30/2022	7/29/2021	413	397
James Elmore	Press Supervisor	10/17/2023	8/30/2022	7/29/2021	413	397
James Moore	Pressman	10/17/2023	8/30/2022	7/29/2021	413	397

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(7)(iii)], facility personnel must take part in an annual review of the initial training required in paragraph (a)(7)(i) of this section.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2021. Manifests reviewed appeared to be free of errors with the Designated Facility signed copy available for review. Hazardous waste manifest records show that D001 hazardous waste for flammable liquids (including n-propyl alcohol, n-propyl acetate, and waste ink) are routinely shipped bi-weekly to DART A Clean Earth Company (DART) in Charlotte, N.C. The most recent shipment was made on 10/03/2023 for D001 hazardous waste, universal waste lamps, and used oil. Non-hazardous waste, universal waste and used oil are also shipped to DART.

Receipts for Solvent-Contaminated Wipes:

Solvent-contaminated wipes are laundered by Aramark. Aramark pick-up receipts were available for review. The last three shipments of solvent-contaminated wipes were on 09/21/2022, 10/05/2023, and 10/12/2023.

Weekly Inspection Records:

The inspectors reviewed the facility's available records of inspections of the hazardous waste (CAA) since 07/28/2020. The inspection log includes a checklist to record observations about containers but did not specify what an employee looks for while conducting an inspection of 90-day CAA hazardous waste containers (such as evidence of leaks, corrosion, damaged container). The facility representatives stated they do look for these issues and would update their weekly inspection checklist to include more detail on what is being inspected. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log.

In an email from Craig Bonde dated 11/10/2023, an updated inspection checklist was provided to include inspection for leaks, corrosion, and damaged containers.

Legitimate Recycling Documentation:

The facility keeps on a file a signed document that describes the facility's legitimate recycling process and documents three factors that are required by the state for legitimate recycling: a closed loop recycled process, the material is used by the generator as an effective substitute for a commercial product or ingredient in a process, and is an analogous raw material managed consistently with raw material.

Waste Minimization Plan:

The facility's waste minimization plan was available for review. The document was last updated on 11/26/2021.

Waste Profiles:

The facility uses the company Southern Logistics, Inc. for hazardous waste transport to DART as well as waste profiling. Records of waste profiles and safety data sheets were available for review.

Biennial Report:

The facility's biennial report was available for review. It was last submitted on February 23, 2022.

Air Permit and Records:

The facility is equipped with a natural gas fired regenerative thermal oxidizer as the air emission control device. The facility conducts annual reporting as required by their Title V air permit #02221T20.

13) Closing Conference

The inspectors conducted the exit meeting at with Craig Bonde and Jeremy Gilbert. During this meeting, the inspectors stated their preliminary conclusions of the inspection. The facility representatives agreed to provide photos and requested documentation via email as soon as possible for the excluded solvent-contaminated wipes container (with proper labeling), a map with location of hazardous waste, and an aerial map of surrounding neighborhood. On 11/10/2023, Craig Bonde submitted the requested documents and photos.

14) List of Appendices

Appendix 1 – Photo Log

15) Signed

KAYLA ACOSTA Digitally signed by KAYLA ACOSTA
Date: 2023.12.12 11:15:57 -05'00'

Kayla Acosta
Physical Scientist

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2023.12.12 14:32:37 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Appendix 1 – Photo Log

[11] Photos taken on: 10/17/2023

Photos taken by: Kayla Acosta

Photos taken with: iPad/ Smart Tools Application

EPA Property Tag: SS8386



4,000-gallon AST labeled “Recycled Solvent” with an NFPA placard and 8,000-gallon AST labeled “North State Blend” with an NFPA placard.			Photo 1: File: IMG-2023101708584758472078833.jpg
10/17/2023 08:58 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/Tank storage			36.01033814, -79.83654594



Two (2) 550-gallon double-walled ASTs for HSM solvent.			Photo 2: File: IMG-20231017090602622055226.jpg
10/17/2023 09:06 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/CAA2 - Ink / Distillation Room			36.01026803, -79.83665725



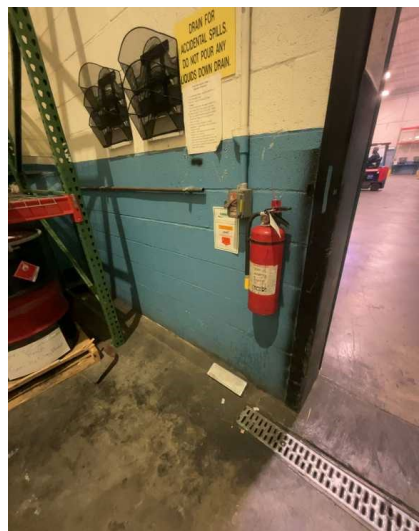
550-gallon AST for Clean Solvent and two (2) 55-gallon drums of hazardous waste still bottoms to be moved to CAA.			Photo 3 File: IMG-202310170908478472036448.jpg
10/17/2023 09:08 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/CAA2 - Ink / Distillation Room			36.01020629, -79.83667694



5-gallon container of solvent-contaminated wipes labeled "used rags".			Photo 4 File: IMG-2023101709121912191819016.jpg
10/17/2023 09:12 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/CAA2 - Ink / Distillation Room			36.01024582, -79.83667728



90-Day CAA Entrance			Photo 5 File: IMG-2023101709302030201904444.jpg
10/17/2023 09:30 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/CAA 1 - Warehouse			36.01023203, -79.83619797



Emergency Equipment in CAA			Photo 6 File: IMG-2023101709303730371810758.jpg
10/17/2023 09:30 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/CAA 1 - Warehouse			36.01034791, -79.83578779



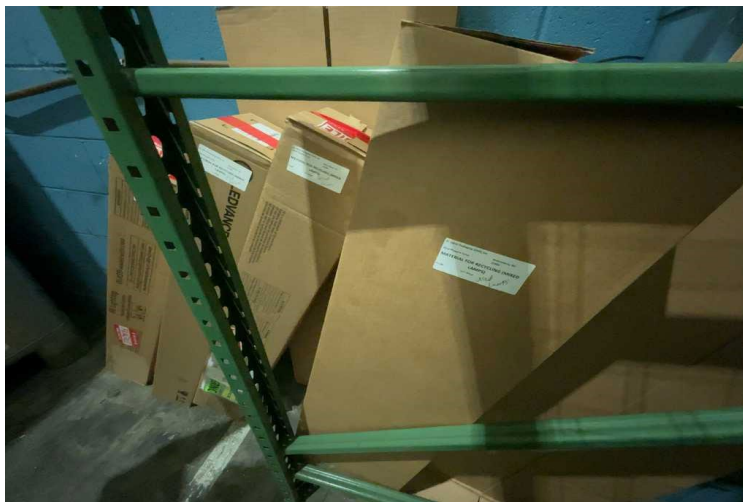
90-Day hazardous waste containers.			Photo 7 File: IMG-2023101709361736171815027.jpg
10/17/2023 09:36 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/CAA 1 - Warehouse			36.01037265, -79.83609411



90-Day hazardous waste containers.			Photo 8 File: IMG-2023101709363236322074378.jpg
10/17/2023 09:36 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/CAA 1 - Warehouse			36.01024638, -79.83600531



90-Day hazardous waste containers.			Photo 9 File: IMG-2023101709391139111957518.jpg
10/17/2023 09:39 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/CAA 1 - Warehouse			36.01023131, -79.83602293



Universal Waste Lamps (4) boxes.			Photo 10 File: IMG-2023101709423442341918472.jpg
10/17/2023 09:42 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/Universal Waste Storage			36.01034937, -79.83579374



55-gallon used oil container.			Photo 11 File: IMG-2023101709551955191921808.jpg
10/17/2023 09:55 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Manufacturing Building/Shop Entrance			36.00987634, -79.83591243