

## EPA Region 10 Enforcement Division

### INSPECTION REPORT

|                                   |                                                                                                                                                                                |                 |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Inspection Entry Date/Time        | 09/29/2022 09:39 AM (PT)                                                                                                                                                       | Announced: No   |
| Inspection Exit Date/Time         | 09/29/2022 02:22 PM (PT)                                                                                                                                                       | Access: Granted |
| Regulatory Program                | RCRA                                                                                                                                                                           |                 |
| Type of Inspection                | CEI - Compliance Evaluation Inspection                                                                                                                                         |                 |
|                                   |                                                                                                                                                                                |                 |
| Company Name                      | King County DOT Department of Local Services - Road Services Division                                                                                                          |                 |
| Facility or Site Name             | King County DOT Department of Local Services - Road Services Division                                                                                                          |                 |
| Facility/Site Identifier          | WAD047476882                                                                                                                                                                   |                 |
| Facility/Site Physical Address    | 155 Monroe Avenue NE Bldg. P, G, and F                                                                                                                                         |                 |
| City, State, Zip Code             | Renton, WA 98056                                                                                                                                                               |                 |
| County/Borough                    | King                                                                                                                                                                           |                 |
| Generator Status                  | Large Quantity Generator                                                                                                                                                       |                 |
| NAICS Identified by Generator     | 212319 - OTHER CRUSHED AND BROKEN STONE MINING AND QUARRYING                                                                                                                   |                 |
| Type of Operation                 | Road Services                                                                                                                                                                  |                 |
| Size of Facility                  | 54.11 acres                                                                                                                                                                    |                 |
| Length of Facility at Location    | 20 years or more                                                                                                                                                               |                 |
| Geographic Coordinates            | 47.483192, -122.17491                                                                                                                                                          |                 |
| Mailing Address/Secondary Address | Mr. Brent Dhoore, Environmental Scientist<br>155 Monroe Avenue NE, Bldg. A<br>Renton, WA 98056<br><a href="mailto:brent.dhoore@kingcounty.gov">brent.dhoore@kingcounty.gov</a> |                 |
| City, State, Zip Code             | Renton, WA 98056                                                                                                                                                               |                 |
|                                   |                                                                                                                                                                                |                 |
| Permit Number (If Applicable)     | Not Applicable                                                                                                                                                                 |                 |

|                           |               |                             |                |
|---------------------------|---------------|-----------------------------|----------------|
| <b>Lead Inspector:</b>    |               |                             |                |
| Jon Jones                 |               |                             |                |
|                           | EPA Region 10 | Jones.Jon@epa.gov           | (907) 271-6329 |
|                           |               |                             |                |
| <b>Supervisor Review:</b> |               |                             |                |
| Jen Sullivan              |               |                             |                |
|                           | EPA Region 10 | Sullivan.Jennifer.A@epa.gov | (206) 553-6978 |

## SECTION I – INTRODUCTION

### Site Entry and Purpose of the Inspection

Type of inspection: CEI - Compliance Evaluation Inspection

Inspection Date(s): 09/29/2022

This was a Resource Conservation and Recovery Act (RCRA) inspection. The facility was inspected to ensure compliance with Washington's federally authorized hazardous waste regulations found at Washington Administrative Code (WAC) 173-303. The facility was inspected to ensure compliance with standards for hazardous waste generators (WAC 173-303-170 through 230), universal waste management standards (WAC 173-303-573), and requirements for management of used oil (WAC 173-303-515). The inspection was conducted as a Core Program Requirement for FY 2022.

This report is based on information supplied by King County DOT Department of Local Services - Road Services Division facility representatives, observations made by the EPA Region 10 inspectors, and records and reports maintained by the facility, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by or information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or after the Inspection from a review of USEPA, State, and public records may be included in this report.

### Attendees

| Title/Organization                                                                       | Name            | Phone          | Email                       | Opening Conf. | Closing Conf. |
|------------------------------------------------------------------------------------------|-----------------|----------------|-----------------------------|---------------|---------------|
| Lead Inspector/EPA Region 10                                                             | Jon Jones       | 9072716329     | Jones.Jon@epa.gov           | Yes           | Yes           |
| Environmental Scientist II/King Co. Department of Local Services, Road Services Division | Jim Crawford    | (206) 255-9598 | jim.crawford@kingcounty.gov | Yes           | Yes           |
| Compliance Inspector/Washington Department of Ecology                                    | Katelynn Piazza | (206) 518-3622 | katelynn.piazza@ecy.wa.gov  | Yes           | Yes           |
| RCRA Inspector, EPA Region 10                                                            | Jennifer Parker | (206) 553-1900 | parker.jennifer@epa.gov     | Yes           | Yes           |
| Environmental Scientist/King Co. Department of Local Services, Road Services Division    | Brent Dhoore    | (206) 477-2606 | brent.dhoore@kingcounty.gov | No            | Yes           |

### Opening Conference

EPA Region 10 Lead Inspector, Jon Jones, arrived at the King County DOT Department of Local Services - Road Services Division Facility (the "Site" or "Facility"), located at 155 Monroe Avenue NE Bldg. P, G, and F, Renton, WA 98056, at 09:39 AM (PT) on 09/29/2022 for an unannounced inspection. Inspector Jones presented credentials to and informed Jim Crawford that this was an EPA Region 10 inspection to determine compliance with the Resource Conservation and Recovery Act (RCRA).

Inspection Date(s): 09/29/2022

**Facility/Site Information**

|                                                     |                                                                                       |
|-----------------------------------------------------|---------------------------------------------------------------------------------------|
| <b>Number of employees</b>                          | 150                                                                                   |
| <b>Weather Conditions</b>                           | Cloudy                                                                                |
| <b>Operating Hours</b>                              | 24 hours a day, 7 days a week, 365 days a year. 6:00 am to 4:30 pm for the main crew. |
| <b>Safety Training Provided to Inspector(s)?</b>    | No                                                                                    |
| <b>What type of generator facility notified?</b>    | Large Quantity Generator (LQG)                                                        |
| <b>What type of generator facility verified as?</b> | LQG verified by Jim Crawford                                                          |

**Process Description**

Mr. Crawford invited us into his office area while he canceled his meetings for the day. We held an opening conference. During the opening conference, Mr. Crawford told us that his facility generated the following wastes:

- Used oil – uncontaminated used oil is recycled in an on-site burner at the facility
- Used antifreeze
- Fluorescent lamps and batteries that are managed as universal waste.
- Orphaned wastes that are picked up along the roadside within King County.
- Aerosols managed as hazardous waste
- E-waste
- Solvents
- Traffic paint

During the inspection of the facility, we were accompanied by Mr. Crawford. Shortly after the inspection began, we were joined by Mr. Brent Dhoore, Environmental Scientist.

During the inspection we looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We also observed the facility's universal waste and used oil management. Specifically, we inspected the following areas of the facility listed below.

**Building(s)**

| <b>Building/Area/Sub-area</b> | <b>Process Description</b>                      | <b>Area of Concern</b> |
|-------------------------------|-------------------------------------------------|------------------------|
| <b>Building B</b>             | Sign Shop                                       | No                     |
| <b>Building F</b>             | Fleet Services Lube Shop                        | Yes                    |
| <b>Building G</b>             | Fleet Services - Main Fleet Vehicle Maintenance | Yes                    |
| <b>Building J</b>             | Administration                                  | No                     |
| <b>Building C</b>             | Environmental office                            | No                     |
| <b>Building P</b>             | Traffic Striping Paint Area                     | Yes                    |
| Traffic Striping Paint Area   | Storage of traffic paint totes                  | Yes                    |

Inspection Date(s): 09/29/2022

|                                   |                                                            |     |
|-----------------------------------|------------------------------------------------------------|-----|
| <b>Hazardous Waste Shed (CAA)</b> | Central Accumulation Area                                  | Yes |
| <b>Planning Unit 9</b>            | SAA<br>Universal waste storage<br>Electronic waste storage | No  |

**SECTION II – OBSERVATIONS****Building:** Building G**Observation #:** JJ1-OB-001**Date:** 09/29/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Brent Dhoore**Title:** Environmental Scientist

While inspecting the Main Fleet Vehicle Maintenance shop we were introduced to one of the facility mechanics who identified himself as Blade. Blade accompanied us throughout the shop. During the inspection of the shop, I saw multiple (4+) oil pans throughout the shop that contained varying amounts of used oil, none of which were labeled with the words "Used Oil." I explained to both Blade and Mr. Dhoore that containers, including oil drain pans, used to store used oil were required to be labeled. I also saw multiple oil pans stacked up in different areas of the shop that did not contain used oil during the inspection. I suggested to Blade and Mr. Dhoore that if these were containers they routinely use for the accumulation of used oil, it would help to label them also to ensure compliance with the used oil regulations.

While still inspecting the shop, I saw a mop bucket that was full of dirty water. I asked Blade about the contents of the bucket, and he explained that it was just dirty water from mopping up spills on the floor. Mr. Dhoore explained that the mop water is dark because it is oily water, which has been determined based on knowledge of the process. Not knowing exactly what the contaminants in the mop water were, I suggested that a waste determination might be needed.

Following the inspection, I received an email from Mr. Dhoore dated 10/19/22 which addressed updates regarding some of the remaining areas of concern that were identified during the inspection on 9/29/22. In that email, Mr. Dhoore stated:

"We are coordinating with our contract lab to test the fleet mop bucket water for designation" and "I also dropped off some printed used oil labels yesterday to our Fleet office so they can label all of the used oil containers in the shops that currently are not labeled. We will be following up with them soon to ensure everything is properly labeled."

**Photo(s)**

1. [IMG\\_0006.jpg](#)
2. [IMG\\_0007.jpg](#)
3. [IMG\\_0008.jpg](#)
4. [IMG\\_0009.jpg](#)
5. [IMG\\_0010.jpg](#)
6. [IMG\\_0012.jpg](#)
7. [IMG\\_0011.jpg](#)
8. [IMG\\_0013.jpg](#)
9. [IMG\\_0014.jpg](#)

Inspection Date(s): 09/29/2022

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| <b>Building:</b> Building F                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                         |                                       |                         |
| <b>Observation #:</b> JJ1-OB-002                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Date:</b> 09/29/2022 | <b>Contains AOC:</b> Yes              | <b>Contains CBI:</b> No |
| <b>Person Interviewed:</b> Brent Dhoore                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                         | <b>Title:</b> Environmental Scientist |                         |
| <p>While we inspected Building F, Isaac from facility services joined us and answered questions.</p> <p>While inspecting the Fleet Services Lube Shop at Building F, I saw a black used oil drain pan on the floor beneath a used oil filter crusher. At the time of the inspection, this used oil pan was not labeled with the words "Used Oil."</p> <p>Adjacent to the used oil filter crusher, I saw a large, elevated drain pan with a grate over the top. At the time of the inspection, there were multiple used oil filters on top of the grate and used oil was draining from the filters and being collected in the elevated drain pan. This elevated drain pan contained used oil and was not labeled with the words "Used Oil."</p> <p>While still inspecting the Fleet Services Lube Shop building, I saw a spill pallet that contained oil. The facility representative confirmed it was used oil. At the time of the inspection, the spill pallet was not labeled with the words "Used Oil."</p> <p>While still in the Fleet Services Lube Shop building, I inspected the contents of a couple of metal trash receptacles. During this inspection, I saw a waste aerosol can in each trash receptacle. I shook the contents of one of the waste aerosol cans and could hear and feel liquid sloshing around inside the aerosol can. According to the labeling on the waste aerosol cans, the aerosols contents were extremely flammable and under pressure. At the time of the inspection, facility personnel told me that waste aerosols generated at the facility were managed as solid waste and discarded into the trash.</p> <p>While inspecting more trash receptacles in the Fleet Services Lube Shop building, I saw a waste leather glove inside a large plastic trash can. I explained to facility personnel that many waste leather gloves are known to fail TCLP for chromium (D007). I explained that a waste determination should be made on the waste leather glove.</p> <p>Prior to leaving the Fleet Services Lube Shop building, I saw a large metal used oil drain pan connected to a lift that held used oil and was not labeled with the words "Used Oil."</p> <p>I also saw another metal trash receptacle that held multiple waste aerosol cans. There were eight waste aerosol cans in the trash can. According to the labeling on the waste aerosol cans, the aerosols contents were extremely flammable and under pressure. I shook the contents of some of the waste aerosol cans and could hear and feel liquid sloshing around inside the aerosol cans.</p> <p>As we finished walking through Building F, Mr. Dhoore told us that the facility ships out fully intact aerosol cans that still contain product as hazardous waste. He explained further that the facility representatives thought that if they fully sprayed out the contents, then the waste aerosol cans could just go in the trash cans for management as solid waste. I asked for safety data sheets (SDS's) for the waste aerosol cans we observed in the trash receptacles.</p> <p>As we were leaving the Fleet Services Lube Shop building, I saw two more waste aerosol cans beneath and behind the used oil filter crusher that we first saw when we entered the building. At the time of the inspection, the facility was not managing their waste aerosol cans as hazardous waste. Prior to leaving the area, I explained both methods of hazardous waste aerosol can management to facility personnel.</p> |                         |                                       |                         |

Inspection Date(s): 09/29/2022

Following the inspection, I received an email from Mr. Dhoore dated 10/19/22, which addressed updates regarding some of the remaining areas of concern that were identified during the inspection on 9/29/22. In that email, Mr. Dhoore stated:

"Hello good afternoon, Jon, I wanted to send you a few updates on things we are working through in response to the inspection of our facility on 9/29/2022. We are coordinating with our contract lab to test the leather gloves for designation that were found in the trash can. I also dropped off some printed used oil labels yesterday to our Fleet office so they can label all the used oil containers in the shops that currently are not labeled. We will be following up with them soon to ensure everything is properly labeled."

**Photo(s)**

1. [IMG\\_0015.jpg](#)
2. [IMG\\_0017.jpg](#)
3. [IMG\\_0021.jpg](#)
4. [IMG\\_0020.jpg](#)
5. [IMG\\_0016.jpg](#)
6. [IMG\\_0019.jpg](#)
7. [IMG\\_0018.jpg](#)
8. [IMG\\_0022.jpg](#)
9. [IMG\\_0023.jpg](#)
10. [IMG\\_0024.jpg](#)
11. [IMG\\_0025.jpg](#)
12. [IMG\\_0026.jpg](#)
13. [IMG\\_0027.jpg](#)
14. [IMG\\_0030.jpg](#)
15. [IMG\\_0034.jpg](#)
16. [IMG\\_0033.jpg](#)
17. [IMG\\_0032.jpg](#)
18. [IMG\\_0028.jpg](#)

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|---------------------------------------|-------------------------|
| <b>Building:</b> Building P/Traffic Striping Paint Area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                         |                                       |                         |
| <b>Observation #:</b> JJ1-OB-003                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Date:</b> 09/29/2022 | <b>Contains AOC:</b> Yes              | <b>Contains CBI:</b> No |
| <b>Person Interviewed:</b> Brent Dhoore                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                         | <b>Title:</b> Environmental Scientist |                         |
| <p>Wes Harvey, Traffic Supervisor, joined us as we inspected Building P.</p> <p>While inspecting the striping paint storage area outside and adjacent to Building P, I saw multiple (12+) 5-gallon containers that used to contain ignitable paint and had been allowed to dry out/evaporate. I asked for SDS's for the traffic paint (White and yellow) during the inspection. I viewed the labeling on the paint totes and saw that the paint was ignitable (D001).</p> <p>While in the striping paint storage area, I also observed five waste aerosol cans. Two of the five waste aerosol cans were in a pit, beneath some of the paint totes. The two waste aerosol cans were rusty and looked like that had been discarded in the pit a long time before the inspection. The contents of the two waste aerosols were unknown due to missing labeling. There were additional containers of waste paint-related materials in the</p> |                         |                                       |                         |

Inspection Date(s): 09/29/2022

same area. The contents of those containers were not identifiable and no information was provided regarding the results of a hazardous waste determination for these wastes.

In the traffic paint tote area, yellow paint had leaked out of one of the totes and had been allowed to solidify on the asphalt surface where it had leaked.

Following the inspection, I received SDS's, from Mr. Dhoore on 10-5-22, for both the white and yellow traffic paints used at the facility. I reviewed the SDS information for both traffic paints and saw that each was an ignitable (D001) paint. The flash point for each was -0.4° F. These SDS's are included as attachments and listed in the document log.

**Document(s)**

1. Traffic white paint 2020\_current.pdf
2. TRAFFI 2.PDF

**Photo(s)**

1. [IMG\\_0044.jpg](#)
2. [IMG\\_0046.jpg](#)
3. [IMG\\_0041.jpg](#)
4. [IMG\\_0048.jpg](#)
5. [IMG\\_0040.jpg](#)
6. [IMG\\_0037.jpg](#)
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19. [IMG\\_0054.jpg](#)
20. [IMG\\_0055.jpg](#)
21. [IMG\\_0056.jpg](#)
22. [IMG\\_0057.jpg](#)
23. [IMG\\_0058.jpg](#)

**Building:** Building P**Observation #:** JJ1-OB-004**Date:** 09/29/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Brent Dhoore**Title:** Environmental Scientist

Inspection Date(s): 09/29/2022

While inspecting the interior of the building, I saw a waste aerosol can inside a trash receptacle. The aerosol was a can of marking paint, and the label identified the contents as extremely flammable liquid (D001) that were under pressure (D003). At the time of the inspection, the waste aerosol can was not being managed as a hazardous waste.

While still in the building, I also saw a 5-gallon bucket that was not closed and had contained what appeared to be an ignitable paint waste that had been allowed to dry/evaporate. This was verified by facility personnel as waste yellow traffic paint. The yellow traffic paint used at the facility is ignitable (D001) when in liquid form.

**Photo(s)**

1. [IMG\\_0062.jpg](#)
2. [IMG\\_0060.jpg](#)
3. [IMG\\_0061.jpg](#)

**Building:** Hazardous Waste Shed (CAA)**Observation #:** JJ1-OB-005**Date:** 09/29/2022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Brent Dhoore**Title:** Environmental Scientist

We arrived at the facility's Hazardous Waste Shed (CAA) and prior to entering the gated CAA area, I saw a large, wheeled, trash receptacle with a hinged lid that was staged outside the fence. The trash receptacle had a capacity of 96 gallons and contained approximately 25 waste aerosol cans. At the time of the inspection, facility personnel stated that the container was being utilized as a satellite accumulation area (SAA) container. We explained that an SAA container could only accumulate up to a maximum of 55-gallons. During the inspection, I saw that the container was not labeled with the words "Hazardous Waste" and was not marked with a hazard indicator. Mr. Dhoore labeled the container with the words "Hazardous Waste" and a hazard indicator during the inspection.

Following the inspection, I received an email from Mr. Dhoore on 10-5-22, that included photo documentation that showed the 96-gallon container, referenced above, had been replaced with a 55-gallon container.

Directly across from the CAA, we saw a black tote that was approximately one cubic yard in size. At the time of the inspection, the tote contained waste lamps and waste bulbs. The containers contents were being managed as universal waste and the tote was labeled as "Universal Waste - Bulbs." We explained that the tote was required to be labeled with the words "Universal Waste - Lamps."

Following the inspection, I received an email from Mr. Dhoore on 10-5-22, that included photo documentation showing that the tote, referenced above, had been labeled with the words "Universal Waste - Lamps."

We also saw that there was a 5-gallon container on top of the tote that contained waste batteries that were not alkaline batteries. At the time of the inspection, the 5-gallon container was not labeled with the words "Universal Waste - Batteries." The container was labeled "Universal Waste - Button Batts." This area of concern has yet to be addressed.

We entered the fenced CAA and while there I saw two blue, 15-gallon containers. According to the labeling, the containers held waste epoxy resin and were brought into the CAA on 8/10/22. At the time of the inspection, both containers were not closed. The first one of the two was labeled with the words "Hazardous Waste" and marked with an accumulation start date (ASD) of 8/10/22 but had no hazard indicator. The second of the two was not labeled with the words "Hazardous Waste" or marked with a hazard indicator and ASD. The facility representatives told us the county's hazardous waste vendor had refused to take these containers off-site during the last quarterly pick up since they were open.

Inspection Date(s): 09/29/2022

Following the inspection, I received an email from Mr. Dhoore dated 10/19/22, which addressed updates regarding some of the remaining areas of concern that were identified during the inspection on 9/29/22. In that email, Mr. Dhoore stated:

"We also transferred the two open top blue containers of epoxy to 30 gal drums that are now closed with lids and rings."

While moving through the CAA, I saw a 5-gallon container that held waste flares. At the time of the inspection, the container was not labeled with the words "Hazardous Waste" and not marked with an ASD. The container was also not closed.

Following the inspection, I received an email from Mr. Dhoore on 10-5-22, that included photo documentation showing that the 5-gallon container, referenced above, had been closed.

I also saw a blue, 55-gallon container that was labeled as "Pending Analysis." The container was also labeled with a hazardous waste marking, a hazard indicator, and marked as containing mixed automotive fluids. At the time of the inspection, the container was marked with an ASD of 12/1/21, indicating that it had been in accumulation for greater than 90-days. According to the date, the container had been in the CAA for 302 days.

Following the inspection, I received another email from Mr. Dhoore dated 10/19/22, which addresses updates regarding some of the remaining areas of concern that were identified during the inspection on 9/29/22. In that email, Mr. Dhoore stated:

"I've also coordinated with our disposal vendor to come out and pick up the remaining waste items in our cage. The earliest they could come out is November 9th, so I've scheduled for that day. If they can come sooner of course we will do that."

At the time this report was submitted, EPA has not received any information confirming that the waste has been shipped off-site.

While continuing my inspection of the facility's CAA, I saw a 5-gallon container that held waste Chlor-D-Tect kits. According to facility personnel, the waste container was being used as a SAA container. At the time of the inspection, the container was labeled with the words "Hazardous Waste" and marked with a hazard indicator; however, the container was not closed.

Following the inspection, I received an email from Mr. Dhoore on 10-5-22, that included photo documentation showing that the 5-gallon container, referenced above, had been closed.

Adjacent to the container of Chlor-D-Tect kits, I saw a container that held waste mercury switches. The container held approximately 16 waste mercury switches. At the time of the inspection, the container was not closed, and it was not labeled with either the words "Universal Waste Mercury - Containing Equipment," "Waste Mercury - Containing Equipment," or "Used Mercury - Containing Equipment." The container was labeled with a universal waste label and the words "Mercury Switches" was written on the label.

Following the inspection, I received an email from Mr. Dhoore on 10-5-22, that included photo documentation that the 5-gallon container, referenced above, had been closed.

The facility takes in orphaned waste that is left on the roadside in King County and during my inspection of the CAA I saw a pallet that contained twenty 5-gallon containers of various wastes. During my inspection of these orphaned wastes, I saw that there were seventeen 5-gallon containers of waste that were not labeled with the words "Hazardous Waste" or marked with hazard indicators. There were two additional 5-gallon waste containers that were also not labeled with the words "Hazardous Waste" or marked with hazard indicators, and they were also not closed. There was also one 5-gallon container that was labeled with the words

Inspection Date(s): 09/29/2022

"Hazardous Waste" but was not marked with a hazard indicator. The ASD for these orphan waste containers was 9/13/22.

Across from the pallets of orphaned waste, I saw a 55-gallon container that held 13 waste aerosol cans. The container was labeled with the words "Hazardous Waste" and marked with a hazard indicator; however, the container was not closed. The container lid was misshapen in a way that did not allow it to make a complete seal with the top of the container. The container was also marked with an ASD of 5/2/22. According to the ASD, the container had been in accumulation for greater than 90-days. At the time of the inspection, the container had been in accumulation for 150 days.

Following the inspection, I received an email from Mr. Dhoore on 10-5-22, that included photo documentation showing that the 55-gallon container, referenced above, had a drum ring attached, closing the container.

Following the inspection, I received another email from Mr. Dhoore dated 10/19/22, which addresses updates regarding some of the remaining areas of concern that were identified during the inspection on 9/29/22. In that email, Mr. Dhoore stated:

"I've also coordinated with our disposal vendor to come out and pick up the remaining waste items in our cage. The earliest they could come out is November 9th, so I've scheduled for that day. If they can come sooner of course we will do that."

At the time this report was submitted, EPA has not received any information confirming that the waste has been shipped off-site.

A 1-gallon container was also found in a trash receptacle while inspecting the CAA. The container was removed from the trash during the inspection. The facility personnel explained to the EPA inspectors that it contained used oil. At the time of the inspection, the container of used oil was not labeled with the words "Used Oil."

Following the inspection, I received an email from Mr. Dhoore on 10-5-22, that included photo documentation showing that the 1-gallon container, referenced above, had since been labeled with the words "Hazardous Waste" versus "Used Oil." However, there was no hazard indicator marked on the container and the ASD of 10/3/22 is not accurate since the waste container had already been generated and was in the trash during the 9/29/22 inspection.

#### Document(s)

1. AEROSO 1.JPG
2. AEROSO 2.JPG
3. FLAREA 1.JPG
4. OILCON 1.JPG
5. UNIVER 1.JPG

Inspection Date(s): 09/29/2022

**Photo(s)**

1. [IMG\\_0084.jpg](#)
2. [IMG\\_0074.jpg](#)
3. [IMG\\_0085.jpg](#)
4. [IMG\\_0091.jpg](#)
5. [IMG\\_0069.jpg](#)
6. [IMG\\_0064.jpg](#)
7. [IMG\\_0063.jpg](#)
8. [IMG\\_0068.jpg](#)
9. [IMG\\_0065.jpg](#)
10. [IMG\\_0066.jpg](#)
11. [IMG\\_0073.jpg](#)
12. [IMG\\_0067.jpg](#)
13. [IMG\\_0070.jpg](#)
14. [IMG\\_0072.jpg](#)
15. [IMG\\_0071.jpg](#)
16. [IMG\\_0077.jpg](#)
17. [IMG\\_0078.jpg](#)
18. [IMG\\_0075.jpg](#)
19. [IMG\\_0080.jpg](#)
20. [IMG\\_0079.jpg](#)
21. [IMG\\_0076.jpg](#)
22. [IMG\\_0082.jpg](#)
23. [IMG\\_0081.jpg](#)
24. [IMG\\_0083.jpg](#)
25. [IMG\\_0087.jpg](#)
26. [IMG\\_0086.jpg](#)
27. [IMG\\_0090.jpg](#)
28. [IMG\\_0089.jpg](#)
29. [IMG\\_0088.jpg](#)
30. [IMG\\_0092.jpg](#)
31. [IMG\\_0093.jpg](#)

**SECTION III – RECORDS REVIEW**

|                                                                                                                                                                                                                    |                               |                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------------------------------|
| <b>Record:</b> Inspections                                                                                                                                                                                         |                               | <b>AOC:</b> Yes                  |
| <b>Ref #:</b> JJ1-RR-001                                                                                                                                                                                           | <b>Reviewed By:</b> Jon Jones | <b>Reviewed Date:</b> 09/29/2022 |
| During the paperwork review at the facility, weekly hazardous waste inspection logs were inspected for the period from May 2019 through December 2021. During the inspection of these records, the following weeks |                               |                                  |

Inspection Date(s): 09/29/2022

were identified as a week in which a weekly hazardous waste inspection was not conducted by facility personnel at the facility's CAA:

- August 11-17, 2019
- December 29, 2019 - January 4, 2020
- June 28 - July 4, 2020
- December 6 - 12, 2020
- March 28 - April 3, 2021
- April 4 - 10, 2021
- June 27 - July 3, 2021
- December 26, 2021 - January 1, 2022\*

\*The December 2021 weekly inspection checklist states in the comments section, "Week of 12/27 no inspection due to snow event."

Copies of weekly hazardous waste inspections performed prior to and following weeks where no inspection was performed are included in this report.

At the time of the inspection, the weekly hazardous waste inspection logs for 2022 were documented electronically. During the inspection, I requested that the 2022 weekly inspection logs be emailed to me following the inspection. These inspection records were sent to me via email by Mr. Dhoore on 10-5-22. I reviewed the weekly inspections that ranged from January through September 2022. At the time of this review, I saw that there were no weekly inspection logs for the month of May 2022. Based on this information, there were no weekly hazardous waste inspections conducted during the following four weeks:

- May 1 - 7, 2022
- May 8 - 14, 2022
- May 15 - 21, 2022
- May 22 - 28, 2022

#### Document(s)

1. WklyHWchecklists.pdf
2. JANUAR 1.PDF
3. FEBRUA 1.PDF
4. MARCH2 1.PDF
5. APRIL2 1.PDF
6. June 2022\_Renton\_final.pdf
7. July 2022\_Renton\_final.pdf
8. AUGUST 1.PDF
9. SEPTTEM 1.PDF

**Record:** Manifests

**AOC:** Yes

**Ref #:** JJ1-RR-002

**Reviewed By:** Jon Jones

**Reviewed Date:** 09/29/2022

During my review of the facility's hazardous waste manifests which covered the period of September 2019 through September 2022, I saw the following two hazardous waste manifests for which there was no original returned manifest that had been signed by the designated facility:

Manifest# Date

017187952FLE 6/2/22

017187953FLE 6/2/22

Inspection Date(s): 09/29/2022

Mr. Dhoore sent me an email on 10-5-22, following the inspection, that included copies of the above referenced hazardous waste manifests, and LDR's, that had been signed by the designated facility. These documents are included as attachments and are listed in this reports document log.

**Document(s)**

1. Mans-unsigned by Desfac.pdf
2. 017187952FLE.pdf
3. 017187953FLE.pdf

**Record:** Personnel Training**AOC:** Yes**Ref #:** JJ1-RR-003**Reviewed By:** Jon Jones**Reviewed Date:** 09/29/2022

During my review of the facility's weekly hazardous waste inspections, I saw that while containers of hazardous waste in the facility's CAA we're not closed, not labeled with the words hazardous waste, and were being accumulated for greater than 90-days, these inspection discrepancies were not being noted in the weekly inspection logs. Based on these findings, facility personnel were either not actually conducting the weekly inspections and just continued to fill out the weekly inspection logs or they lack the training to recognize these types of discrepancies.

**SECTION IV – AREAS OF CONCERN**

The presentation of areas of concern does not constitute a formal compliance determination or violation.

| <b>Building:</b> Building G                                                                                                                                                                                                                                                                                             | <b>Area:</b>      | <b>Sub-area:</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| <b>JJ1-OB-001</b>                                                                                                                                                                                                                                                                                                       |                   |                  |
| Multiple (4+) oil pans throughout the shop contained varying amounts of used oil, but were not labeled with the words "Used Oil."                                                                                                                                                                                       | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Building G                                                                                                                                                                                                                                                                                             | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-001</b>                                                                                                                                                                                                                                                                                                       |                   |                  |
| While still inspecting the shop, I saw a mop bucket that was full of dirty water. Facility representatives explained the mop water was such a dark color because it is oily water. Not knowing exactly what had been mopped up in the vehicle maintenance area, I suggested that a waste determination might be needed. | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Building F                                                                                                                                                                                                                                                                                             | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-002</b>                                                                                                                                                                                                                                                                                                       |                   |                  |

Inspection Date(s): 09/29/2022

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                   |                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| I saw three used oil drain pans that contained used oil but were not labeled with the words "Used Oil."                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Building F                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-002</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |                  |
| I saw a spill pallet that contained used oil. At the time of the inspection, the spill pallet was not labeled with the words "Used Oil."                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Building F                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-002</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |                  |
| I inspected the contents of trash receptacles and discovered waste aerosol cans in three of the trash receptacles. I shook the contents of a number of the waste aerosol cans and could hear and feel liquid sloshing around inside the aerosol cans. According to the labeling on the waste aerosol cans, the aerosols contents were flammable and under pressure. At the time of the inspection, facility personnel told me that waste aerosols generated at the facility that were fully sprayed out were managed as solid waste and discarded into the trash. | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Building F                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-002</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |                  |
| I saw a waste leather glove inside of a large plastic trash can. I explained to facility personnel that waste leather gloves are known to fail TCLP for chromium (D007). I explained that a waste determination should be made on the waste leather glove.                                                                                                                                                                                                                                                                                                        | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Building F                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-002</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |                  |
| I saw two more waste aerosol cans beneath and behind a used oil filter                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Citations:</b> | <b>Sections:</b> |

Inspection Date(s): 09/29/2022

|                                                                                                                                                                                                                                                                                                                       |                                          |                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|------------------|
| crusher. At the time of the inspection, the facility was not managing their waste aerosol cans as hazardous waste.                                                                                                                                                                                                    |                                          |                  |
| <b>Building:</b> Building P                                                                                                                                                                                                                                                                                           | <b>Area:</b> Traffic Striping Paint Area | <b>Sub-area:</b> |
| <b>JJ1-OB-003</b>                                                                                                                                                                                                                                                                                                     |                                          |                  |
| I saw multiple (12+) 5-gallon containers that used to contain ignitable paint and had been allowed to dry out/evaporate.                                                                                                                                                                                              | <b>Citations:</b>                        | <b>Sections:</b> |
| <b>Building:</b> Building P                                                                                                                                                                                                                                                                                           | <b>Area:</b> Traffic Striping Paint Area | <b>Sub-area:</b> |
| <b>JJ1-OB-003</b>                                                                                                                                                                                                                                                                                                     |                                          |                  |
| In the striping paint storage area, I observed that yellow paint had leaked out of a traffic paint tote and was allowed to dry in place on the asphalt where it had leaked.                                                                                                                                           | <b>Citations:</b>                        | <b>Sections:</b> |
| <b>Building:</b> Building P                                                                                                                                                                                                                                                                                           | <b>Area:</b> Traffic Striping Paint Area | <b>Sub-area:</b> |
| <b>JJ1-OB-003</b>                                                                                                                                                                                                                                                                                                     |                                          |                  |
| I saw five waste aerosol cans. Two of the five waste aerosol cans were in a pit, beneath some of the paint totes. The two waste aerosol cans were rusty and looked like had been discarded in the pit a long time before the inspection. The contents of the two waste aerosols were unknown due to missing labeling. | <b>Citations:</b>                        | <b>Sections:</b> |
| <b>Building:</b> Building P                                                                                                                                                                                                                                                                                           | <b>Area:</b>                             | <b>Sub-area:</b> |
| <b>JJ1-OB-004</b>                                                                                                                                                                                                                                                                                                     |                                          |                  |
| I saw a waste aerosol can inside a trash receptacle. The aerosol was a can of marking paint, and the contents were described on the label as extremely flammable liquid (D001) that were under pressure (D003). At the time of the inspection, the waste aerosol can                                                  | <b>Citations:</b>                        | <b>Sections:</b> |

Inspection Date(s): 09/29/2022

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                   |                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| was not being managed as a hazardous waste.                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |                  |
| <b>Building:</b> Building P                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-004</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                   |                  |
| A 5-gallon bucket that had contained an ignitable paint waste had been left open and allowed to dry/evaporate. The yellow traffic paint used at the facility is ignitable (D001) when in liquid form.                                                                                                                                                                                                                                                                       | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                   |                  |
| A trash receptacle outside the fenced CAA had a capacity of 96 gallons and contained approximately 25 waste aerosol cans. Facility personnel stated that the container was being utilized as a satellite accumulation area (SAA) container. The SAA container was not labeled with the words "Hazardous Waste" and was not marked with a hazard indicator.. Mr. Dhoore labeled the container with the words "Hazardous Waste" and a hazard indicator during the inspection. | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                   |                  |
| At the time of the inspection, a tote contained waste lamps and waste bulbs that were being managed as universal waste. The tote was labeled as "Universal Waste – Bulbs," rather than "Universal Waste - Lamps."                                                                                                                                                                                                                                                           | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                   |                  |

Inspection Date(s): 09/29/2022

|                                                                                                                                                                                                                                                                                                                                                                                                                    |                   |                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| A 5-gallon container on top of the tote contained waste batteries but was not labeled with the words "Universal Waste - Batteries."                                                                                                                                                                                                                                                                                | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                        | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                  |                   |                  |
| Two, blue, 15-gallon containers held waste epoxy resin and had been brought into the CAA on 8/10/22. At the time of the inspection, both containers were not closed. One of the two was labeled with the words "Hazardous Waste" and marked with an ASD of 8/10/22, but had no hazard indicator. The second of the two was not labeled with the words "Hazardous Waste" or marked with a hazard indicator and ASD. | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                        | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                  |                   |                  |
| A 5-gallon container held hazardous waste flares but at the time of the inspection, the container was not labeled with the words "Hazardous Waste" and not marked with an ASD. The container was also not closed.                                                                                                                                                                                                  | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                        | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                  |                   |                  |
| I also saw a blue, 55-gallon container that was labeled as "Pending Analysis." The container was also labeled with a hazardous waste marking, a hazard indicator, and marked as containing mixed automotive fluids. At the time of the inspection, the container was marked with an ASD of 12/1/21 indicating that it had been in accumulation for greater than 90-days. According to the date, the                | <b>Citations:</b> | <b>Sections:</b> |

Inspection Date(s): 09/29/2022

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                   |                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| container had been in the CAA for 302 days.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                   |                  |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                   |                  |
| I saw a 5-gallon container that held waste Chlor-D-Tect kits. According to facility personnel, the waste container was being used as a SAA container. At the time of the inspection, the container was labeled with the words "Hazardous Waste" and marked with a hazard indicator however, the container was not closed.                                                                                                                                                                                                                                                                                      | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                   |                  |
| The facility takes in orphaned waste that is left on the roadside in King County and during my inspection of the CAA I saw a pallet that contained twenty 5-gallon containers of various wastes. Seventeen of the containers were not labeled with the words "Hazardous Waste" or marked with hazard indicators. Two 5-gallon waste containers that were also not labeled with the words "Hazardous Waste" or marked with hazard indicators, and they were also not closed. There was also one 5-gallon container that was labeled with the words "Hazardous Waste" but wasn't marked with a hazard indicator. | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                   |                  |
| A 55-gallon container that held 13 waste aerosol cans was labeled with the words "Hazardous Waste" and marked with a hazard indicator;                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Citations:</b> | <b>Sections:</b> |

Inspection Date(s): 09/29/2022

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| however, the container was not closed. The container lid was misshapen in a way that did not allow it to make a complete seal with the top of the container. The container was also marked with an ASD of 5/2/22. According to the ASD, the container had been in accumulation for greater than 90-days. At the time of the inspection, the container had been in accumulation for 150 days.                                                                                    |                   |                  |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                   |                  |
| A 1-gallon container was also found in a trash receptacle while inspecting the CAA. The container was removed from the trash during the inspection and to the facility representatives told the EPA inspectors it contained used oil,. At the time of the inspection, the container of used oil was not labeled with the words "Used Oil."                                                                                                                                      | <b>Citations:</b> | <b>Sections:</b> |
| <b>Building:</b> Hazardous Waste Shed (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Area:</b>      | <b>Sub-area:</b> |
| <b>JJ1-OB-005</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                   |                  |
| I saw a container that held waste mercury switches. The container held approximately 16 waste mercury switches. At the time of the inspection, the container was not closed, and it was not labeled with either the words "Universal Waste Mercury - Containing Equipment," "Waste Mercury - Containing Equipment," or "Used Mercury - Containing Equipment." The container was labeled with a universal waste label and the words "Mercury Switches" was written on the label. | <b>Citations:</b> | <b>Sections:</b> |

Inspection Date(s): 09/29/2022

**Record: Inspections****JJ1-RR-001**

During the inspection of these records, the following weeks were identified as a week in which a weekly hazardous waste inspection was not conducted by facility personnel at the facility's CAA:

- August 11-17, 2019
- December 29, 2019 - January 4, 2020
- June 28 - July 4, 2020
- December 6 - 12, 2020
- March 28 - April 3, 2021
- April 4 - 10, 2021
- June 27 - July 3, 2021
- December 26, 2021 - January 1, 2022\*
- May 1 - 7, 2022
- May 8 - 14, 2022
- May 15 - 21, 2022
- May 22 - 28, 2022

\*The December 2021 weekly inspection checklist states in the comments section, "Week of 12/27 no inspection due to snow event."

**Citations:****Sections:****Record: Manifests****JJ1-RR-002**

During my review of the facility's hazardous waste manifests which covered the period of September 2019 through September 2022, I saw the following two hazardous waste manifests for which there was no original returned manifest that had been signed by the designated facility:

Manifest# Date

017187952FLE 6/2/22

017187953FLE 6/2/22

**Citations:****Sections:****Record: Personnel Training****JJ1-RR-003**

Inspection Date(s): 09/29/2022

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                   |                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| During my review of the facility's weekly hazardous waste inspections, I saw that while containers of hazardous waste in the facility's CAA we're not closed, not labeled with the words hazardous waste, and were being accumulated for greater than 90-days, these inspection discrepancies were not being noted in the weekly inspection logs. Based on these findings, facility personnel were either not actually conducting the weekly inspections and just continued to fill out the weekly inspection logs or they lack the training to recognize these types of discrepancies. | <b>Citations:</b> | <b>Sections:</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|

**SECTION V – CLOSING CONFERENCE AND FOLLOW UP****Closing Conference**

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report, as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern are determined to be violations.

**SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.****SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

Inspection Date(s): 09/29/2022

**APPENDIX 1: PHOTO LOG**

|                                                                                                      |                         |        |
|------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                              | IMG_0015.jpg            |        |
| 09/29/2022 11:04 AM                                                                                  | Photographer: Jon Jones |        |
| Building F                                                                                           | No CBI                  | No PII |
| View of used oil drain pan beneath oil filter crusher that is not labeled with the words "Used Oil." |                         |        |



|                                                                                                                                                        |                         |        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                                | IMG_0017.jpg            |        |
| 09/29/2022 11:04 AM                                                                                                                                    | Photographer: Jon Jones |        |
| Building F                                                                                                                                             | No CBI                  | No PII |
| View of an elevated used oil drain pan, seen here with used oil filters draining into the pan. The drain pan is not labeled with the words "Used Oil." |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                                              |                         |        |
|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                      | IMG_0021.jpg            |        |
| 09/29/2022 11:06 AM                                                                                                                          | Photographer: Jon Jones |        |
| Building F                                                                                                                                   | No CBI                  | No PII |
| View of a spill pallet that contains used oil that has accumulated in the pallet. The spill pallet is not labeled with the words "Used Oil." |                         |        |



|                                                        |                         |        |
|--------------------------------------------------------|-------------------------|--------|
| [Title]                                                | IMG_0020.jpg            |        |
| 09/29/2022 11:06 AM                                    | Photographer: Jon Jones |        |
| Building F                                             | No CBI                  | No PII |
| View of a waste aerosol can inside a trash receptacle. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                         |                         |        |
|-------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                 | IMG_0016.jpg            |        |
| 09/29/2022 11:04 AM                                                                                                     | Photographer: Jon Jones |        |
| Building F                                                                                                              | No CBI                  | No PII |
| Close-up view of the used oil drain pan beneath the oil filter crusher, which is not labeled with the words "Used Oil." |                         |        |



|                                                        |                         |        |
|--------------------------------------------------------|-------------------------|--------|
| [Title]                                                | IMG_0019.jpg            |        |
| 09/29/2022 11:06 AM                                    | Photographer: Jon Jones |        |
| Building F                                             | No CBI                  | No PII |
| View of a waste aerosol can inside a trash receptacle. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                       |                         |        |
|-----------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                               | IMG_0018.jpg            |        |
| 09/29/2022 11:04 AM                                                                                                   | Photographer: Jon Jones |        |
| Building F                                                                                                            | No CBI                  | No PII |
| Close-up view of the elevated used oil drain pan that contains used oil and is not labeled with the words "Used Oil." |                         |        |



|                                                                                                            |                         |        |
|------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                    | IMG_0022.jpg            |        |
| 09/29/2022 11:07 AM                                                                                        | Photographer: Jon Jones |        |
| Building F                                                                                                 | No CBI                  | No PII |
| Another view of the same spill pallet that contains used oil and is not labeled with the words "Used Oil." |                         |        |

Inspection Date(s): 09/29/2022



|                                                                           |                         |        |
|---------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                   | IMG_0023.jpg            |        |
| 09/29/2022 11:07 AM                                                       | Photographer: Jon Jones |        |
| Building F                                                                | No CBI                  | No PII |
| Close-up view of the same spill pallet showing that it contains used oil. |                         |        |



|                                                              |                         |        |
|--------------------------------------------------------------|-------------------------|--------|
| [Title]                                                      | IMG_0024.jpg            |        |
| 09/29/2022 11:08 AM                                          | Photographer: Jon Jones |        |
| Building F                                                   | No CBI                  | No PII |
| View of a waste aerosol can inside another trash receptacle. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                      |                         |        |
|----------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                              | IMG_0025.jpg            |        |
| 09/29/2022 11:08 AM                                                  | Photographer: Jon Jones |        |
| Building F                                                           | No CBI                  | No PII |
| Close-up view of the same waste aerosol can in the trash receptacle. |                         |        |

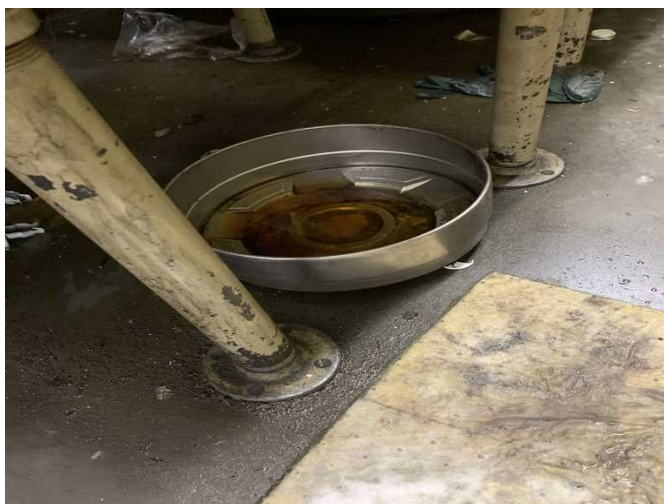


|                                                                |                         |        |
|----------------------------------------------------------------|-------------------------|--------|
| [Title]                                                        | IMG_0026.jpg            |        |
| 09/29/2022 11:13 AM                                            | Photographer: Jon Jones |        |
| Building F                                                     | No CBI                  | No PII |
| View of a waste leather glove seen here in a trash receptacle. |                         |        |

Inspection Date(s): 09/29/2022

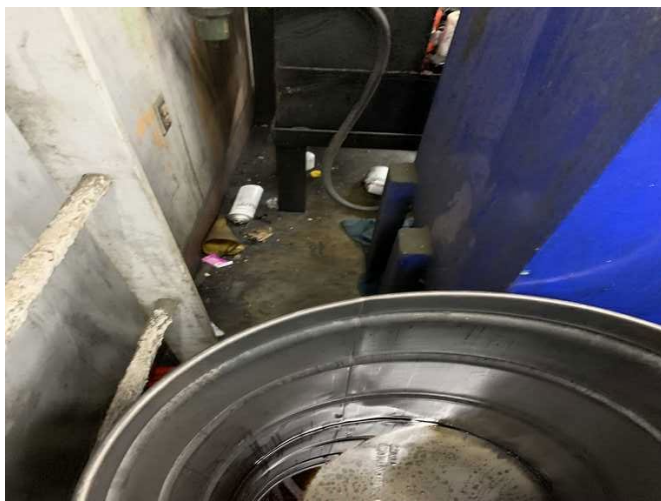


|                                                                                   |                         |        |
|-----------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                           | IMG_0027.jpg            |        |
| 09/29/2022 11:15 AM                                                               | Photographer: Jon Jones |        |
| Building F                                                                        | No CBI                  | No PII |
| View of another used oil drain pan that is not labeled with the words "Used Oil." |                         |        |



|                                                                           |                         |        |
|---------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                   | IMG_0030.jpg            |        |
| 09/29/2022 11:17 AM                                                       | Photographer: Jon Jones |        |
| Building F                                                                | No CBI                  | No PII |
| Another view of the drain pan collecting drips from a hydraulic oil tank. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                             |                         |        |
|---------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                     | IMG_0034.jpg            |        |
| 09/29/2022 11:31 AM                                                                         | Photographer: Jon Jones |        |
| Building F                                                                                  | No CBI                  | No PII |
| View of waste aerosol cans seen here on the floor behind the facility's oil filter crusher. |                         |        |



|                                                                                              |                         |        |
|----------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                      | IMG_0033.jpg            |        |
| 09/29/2022 11:31 AM                                                                          | Photographer: Jon Jones |        |
| Building F                                                                                   | No CBI                  | No PII |
| Another view of the same waste aerosol cans seen on the floor behind the oil filter crusher. |                         |        |

Inspection Date(s): 09/29/2022

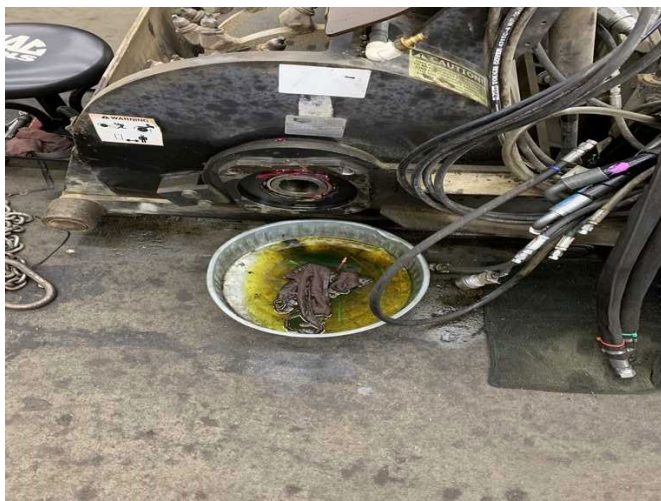


|                                                                         |                         |        |
|-------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                 | IMG_0032.jpg            |        |
| 09/29/2022 11:27 AM                                                     | Photographer: Jon Jones |        |
| Building F                                                              | No CBI                  | No PII |
| View of additional waste aerosol cans seen in another trash receptacle. |                         |        |

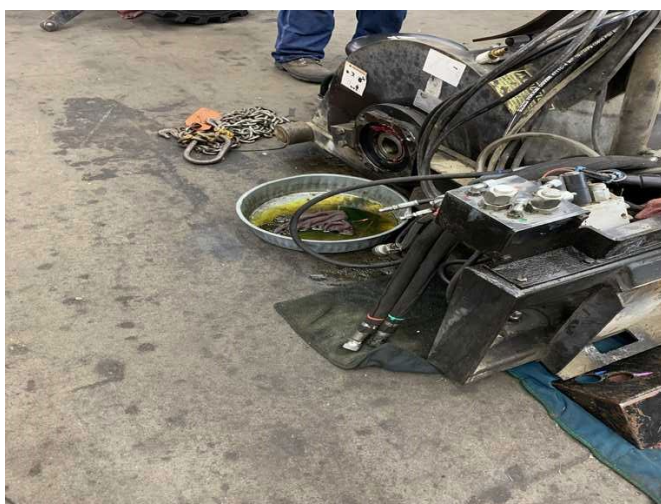


|                                                                                                                                       |                         |        |
|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                               | IMG_0028.jpg            |        |
| 09/29/2022 11:15 AM                                                                                                                   | Photographer: Jon Jones |        |
| Building F                                                                                                                            | No CBI                  | No PII |
| Close-up view of the used oil drain pan seen in an earlier photo that contains used oil and is not labeled with the words "Used Oil." |                         |        |

Inspection Date(s): 09/29/2022

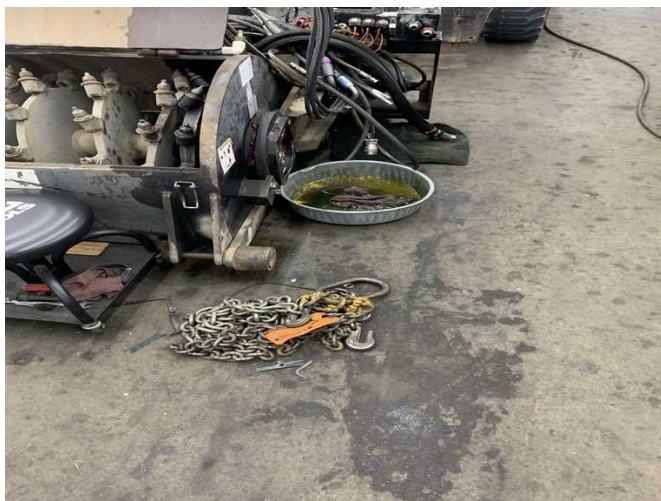


|                                                                                               |                         |        |
|-----------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                       | IMG_0006.jpg            |        |
| 09/29/2022 10:39 AM                                                                           | Photographer: Jon Jones |        |
| Building G                                                                                    | No CBI                  | No PII |
| View of an oil drain pan that contains used oil and is not labeled with the words "Used Oil." |                         |        |



|                                                                            |                         |        |
|----------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                    | IMG_0007.jpg            |        |
| 09/29/2022 10:39 AM                                                        | Photographer: Jon Jones |        |
| Building G                                                                 | No CBI                  | No PII |
| Another view of the same unlabeled used oil drain pan seen in IMG_0006.jpg |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                             |  |                         |        |
|---------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                     |  | IMG_0008.jpg            |        |
| 09/29/2022 10:40 AM                                                                         |  | Photographer: Jon Jones |        |
| Building G                                                                                  |  | No CBI                  | No PII |
| Another view of the same unlabeled used oil drain pan seen in IMG_0006.jpg and IMG_0007.jpg |  |                         |        |



|                                                                                                                                                   |  |                         |        |
|---------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                                                           |  | IMG_0009.jpg            |        |
| 09/29/2022 10:40 AM                                                                                                                               |  | Photographer: Jon Jones |        |
| Building G                                                                                                                                        |  | No CBI                  | No PII |
| View of another used oil drain pan seen here with used oil filters. The drain pan contains used oil and is not labeled with the words "Used Oil." |  |                         |        |

Inspection Date(s): 09/29/2022

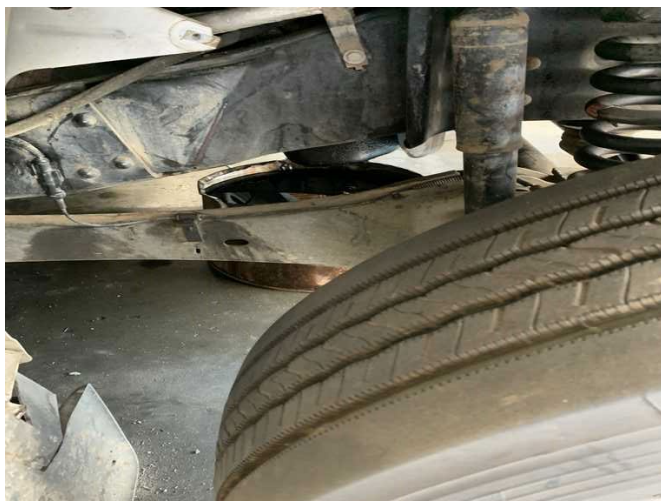


|                                                                  |                         |        |
|------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                          | IMG_0010.jpg            |        |
| 09/29/2022 10:40 AM                                              | Photographer: Jon Jones |        |
| Building G                                                       | No CBI                  | No PII |
| Another view of the same used oil drain pan seen in IMG_0009.jpg |                         |        |



|                                                                                                      |                         |        |
|------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                              | IMG_0012.jpg            |        |
| 09/29/2022 10:42 AM                                                                                  | Photographer: Jon Jones |        |
| Building G                                                                                           | No CBI                  | No PII |
| View of an unlabeled used oil drain pan being actively used, beneath a vehicle, to collect used oil. |                         |        |

Inspection Date(s): 09/29/2022



|                                                  |                         |        |
|--------------------------------------------------|-------------------------|--------|
| [Title]                                          | IMG_0011.jpg            |        |
| 09/29/2022 10:42 AM                              | Photographer: Jon Jones |        |
| Building G                                       | No CBI                  | No PII |
| Another view of an unlabeled used oil drain pan. |                         |        |



|                                                                                   |                         |        |
|-----------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                           | IMG_0013.jpg            |        |
| 09/29/2022 10:42 AM                                                               | Photographer: Jon Jones |        |
| Building G                                                                        | No CBI                  | No PII |
| Another view of the same used oil drain pan seen in IMG_0011.jpg and IMG_0012.jpg |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                                                                     |                         |        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                                             | IMG_0014.jpg            |        |
| 09/29/2022 10:48 AM                                                                                                                                                 | Photographer: Jon Jones |        |
| Building G                                                                                                                                                          | No CBI                  | No PII |
| View of a bucket of mop water that is a dark color and was described as oily water, leading to questions of whether a dangerous waste designation needs to be made. |                         |        |



|                                                                                              |                         |        |
|----------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                      | IMG_0062.jpg            |        |
| 09/29/2022 12:10 PM                                                                          | Photographer: Jon Jones |        |
| Building P                                                                                   | No CBI                  | No PII |
| View of a 5-gallon container of waste yellow traffic paint that had been allowed to dry out. |                         |        |

Inspection Date(s): 09/29/2022



|                                                    |                         |        |
|----------------------------------------------------|-------------------------|--------|
| [Title]                                            | IMG_0060.jpg            |        |
| 09/29/2022 12:10 PM                                | Photographer: Jon Jones |        |
| Building P                                         | No CBI                  | No PII |
| View of a waste aerosol can in a trash receptacle. |                         |        |



|                                                                   |                         |        |
|-------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                           | IMG_0061.jpg            |        |
| 09/29/2022 12:10 PM                                               | Photographer: Jon Jones |        |
| Building P                                                        | No CBI                  | No PII |
| Close-up view of the same waste aerosol can seen in IMG_0060.jpg. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                        |  |                         |        |
|----------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                |  | IMG_0044.jpg            |        |
| 09/29/2022 11:50 AM                                                                    |  | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                 |  | No CBI                  | No PII |
| View of damaged container of traffic paint that appears to need a waste determination. |  |                         |        |

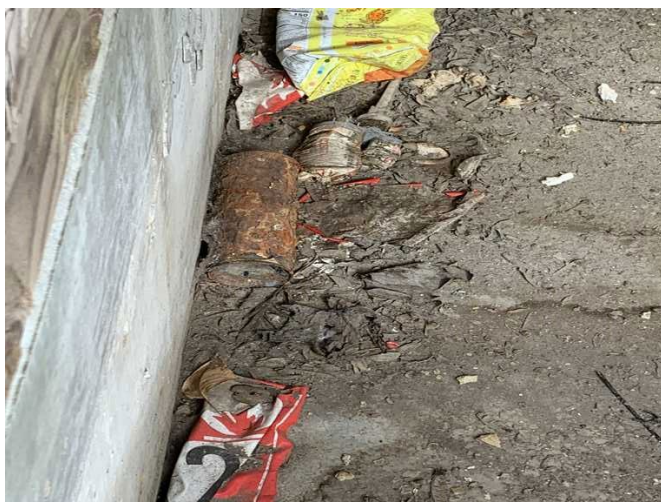


|                                                                              |  |                         |        |
|------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                      |  | IMG_0046.jpg            |        |
| 09/29/2022 11:51 AM                                                          |  | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                       |  | No CBI                  | No PII |
| View of a waste aerosol can in the pit area beneath the traffic paint totes. |  |                         |        |

Inspection Date(s): 09/29/2022



|                                                                       |                         |        |
|-----------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                               | IMG_0041.jpg            |        |
| 09/29/2022 11:49 AM                                                   | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                | No CBI                  | No PII |
| View of a 5-gallon container holding dried waste white traffic paint. |                         |        |



|                                                                                             |                         |        |
|---------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                     | IMG_0048.jpg            |        |
| 09/29/2022 11:51 AM                                                                         | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                      | No CBI                  | No PII |
| View of another waste aerosol can in the bottom of the pit beneath the traffic paint totes. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                 |  |                         |        |
|-----------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                         |  | IMG_0040.jpg            |        |
| 09/29/2022 11:49 AM                                                                                             |  | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                          |  | No CBI                  | No PII |
| View of another 5-gallon container that holds waste traffic paint that was allowed to dry out in the container. |  |                         |        |



|                                                                                                                       |  |                         |        |
|-----------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                               |  | IMG_0037.jpg            |        |
| 09/29/2022 11:47 AM                                                                                                   |  | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                                |  | No CBI                  | No PII |
| View of a 5-gallon container that holds waste yellow traffic paint that had been allowed to dry out in the container. |  |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                                                                                                     |  |                         |        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                                                                                                             |  | IMG_0035.jpg            |        |
| 09/29/2022 11:47 AM                                                                                                                                                                                 |  | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                                                                                                              |  | No CBI                  | No PII |
| View of three 5-gallon traffic paint containers that require a waste determination. Two of the three containers hold waste yellow traffic paint that had been allowed to dry out in the containers. |  |                         |        |



|                                                                                                                                    |  |                         |        |
|------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                                            |  | IMG_0036.jpg            |        |
| 09/29/2022 11:47 AM                                                                                                                |  | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                                             |  | No CBI                  | No PII |
| View of one of the open 5-gallon containers, showing that waste yellow traffic paint had been allowed to dry out in the container. |  |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                    |                         |        |
|------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                            | IMG_0038.jpg            |        |
| 09/29/2022 11:48 AM                                                                | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                             | No CBI                  | No PII |
| View of the closed container of traffic paint that requires a waste determination. |                         |        |



|                                                                                                     |                         |        |
|-----------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                             | IMG_0039.jpg            |        |
| 09/29/2022 11:48 AM                                                                                 | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                              | No CBI                  | No PII |
| View of the waste white traffic paint that had been allowed to dry out inside a 5-gallon container. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                       |                         |        |
|---------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                               | IMG_0042.jpg            |        |
| 09/29/2022 11:50 AM                                                                   | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                | No CBI                  | No PII |
| View of waste yellow traffic paint that had been allowed to dry out in the container. |                         |        |



|                                                                                    |                         |        |
|------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                            | IMG_0043.jpg            |        |
| 09/29/2022 11:50 AM                                                                | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                             | No CBI                  | No PII |
| View of a 5-gallon container of traffic paint that requires a waste determination. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                        |                         |        |
|----------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                | IMG_0045.jpg            |        |
| 09/29/2022 11:51 AM                                                                    | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                 | No CBI                  | No PII |
| Another view of the waste aerosol can in the pit area beneath the traffic paint totes. |                         |        |



|                                                                                                                                                                             |                         |        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                                                     | IMG_0049.jpg            |        |
| 09/29/2022 11:53 AM                                                                                                                                                         | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                                                                                      | No CBI                  | No PII |
| Another view of the three 5-gallon containers of traffic paint. Two of the containers contain waste yellow traffic paint that had been allowed to dry out in the container. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                           |                         |        |
|-------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                   | IMG_0047.jpg            |        |
| 09/29/2022 11:51 AM                                                                       | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                    | No CBI                  | No PII |
| Another view of one of the waste aerosol cans in the pit beneath the traffic paint totes. |                         |        |



|                                                                                                                        |                         |        |
|------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                | IMG_0051.jpg            |        |
| 09/29/2022 11:55 AM                                                                                                    | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                                 | No CBI                  | No PII |
| View of additional 5-gallon container of waste yellow traffic paint that had been allowed to dry out in the container. |                         |        |

Inspection Date(s): 09/29/2022



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|---------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                             |  | IMG_0053.jpg            |        |
| 09/29/2022 11:55 AM                                                                                                 |  | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                              |  | No CBI                  | No PII |
| View of another 5-gallon container of waste yellow traffic paint that had been allowed to dry out in the container. |  |                         |        |



|                                                                                                                  |  |                         |        |
|------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                          |  | IMG_0050.jpg            |        |
| 09/29/2022 11:54 AM                                                                                              |  | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                           |  | No CBI                  | No PII |
| View of additional 5-gallon containers that hold waste paint related material and require a waste determination. |  |                         |        |

Inspection Date(s): 09/29/2022



|                                        |                         |        |
|----------------------------------------|-------------------------|--------|
| [Title]                                | IMG_0054.jpg            |        |
| 09/29/2022 11:59 AM                    | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area | No CBI                  | No PII |
| View of traffic paint totes.           |                         |        |



|                                         |                         |        |
|-----------------------------------------|-------------------------|--------|
| [Title]                                 | IMG_0055.jpg            |        |
| 09/29/2022 11:59 AM                     | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area  | No CBI                  | No PII |
| View of additional traffic paint totes. |                         |        |

Inspection Date(s): 09/29/2022



|                                          |                         |        |
|------------------------------------------|-------------------------|--------|
| [Title]                                  | IMG_0056.jpg            |        |
| 09/29/2022 11:59 AM                      | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area   | No CBI                  | No PII |
| Another view of the traffic paint totes. |                         |        |



|                                                                                                                                                       |                         |        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                               | IMG_0057.jpg            |        |
| 09/29/2022 11:59 AM                                                                                                                                   | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                                                                | No CBI                  | No PII |
| View of a spill of some yellow traffic paint that had not been cleaned up and had instead been allowed to dry out on the asphalt where it had leaked. |                         |        |

Inspection Date(s): 09/29/2022



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|---------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                 | IMG_0058.jpg            |        |
| 09/29/2022 11:59 AM                                                                                     | Photographer: Jon Jones |        |
| Building P/Traffic Striping Paint Area                                                                  | No CBI                  | No PII |
| View of some additional aerosol cans that appeared to be waste-like and required a waste determination. |                         |        |



|                                                                 |                         |        |
|-----------------------------------------------------------------|-------------------------|--------|
| [Title]                                                         | IMG_0084.jpg            |        |
| 09/29/2022 12:43 PM                                             | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                      | No CBI                  | No PII |
| View inside of a container of universal waste mercury switches. |                         |        |

Inspection Date(s): 09/29/2022

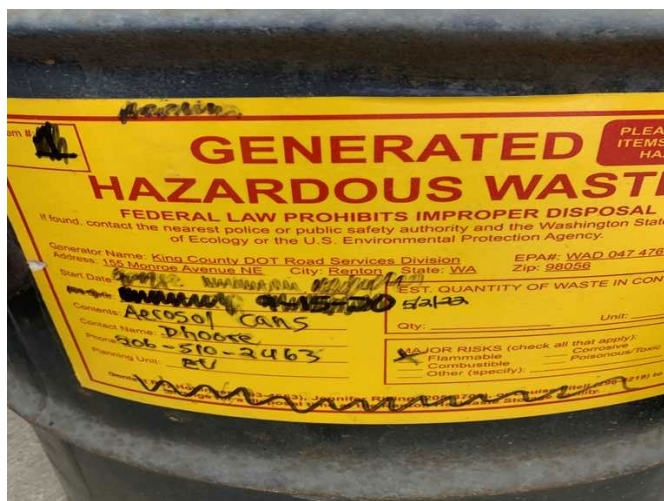


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|-----------------------------------------------------------|-------------------------|--------|
| [Title]                                                   | IMG_0074.jpg            |        |
| 09/29/2022 12:34 PM                                       | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                | No CBI                  | No PII |
| View of the contents of an open container of waste epoxy. |                         |        |



|                                                                       |                         |        |
|-----------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                               | IMG_0085.jpg            |        |
| 09/29/2022 12:43 PM                                                   | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                            | No CBI                  | No PII |
| View of the label on a container of universal waste mercury switches. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                                    |                         |        |
|------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                            | IMG_0091.jpg            |        |
| 09/29/2022 01:00 PM                                                                                                                | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                                         | No CBI                  | No PII |
| View of the label on a container of waste aerosol cans, showing that the container has been in accumulation for more than 90 days. |                         |        |

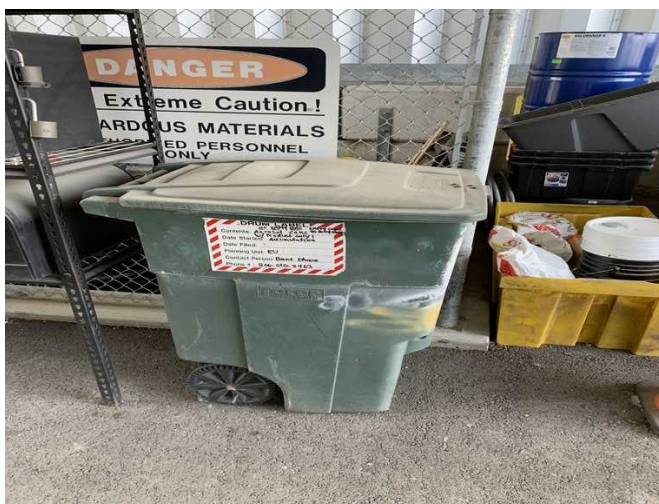


|                                                 |                         |        |
|-------------------------------------------------|-------------------------|--------|
| [Title]                                         | IMG_0069.jpg            |        |
| 09/29/2022 12:29 PM                             | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                      | No CBI                  | No PII |
| View inside of a tote of universal waste lamps. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                              |                         |        |
|--------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                      | IMG_0064.jpg            |        |
| 09/29/2022 12:25 PM                                                                                          | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                   | No CBI                  | No PII |
| View of a trash receptacle that is being used as a SAA container for the accumulation of waste aerosol cans. |                         |        |

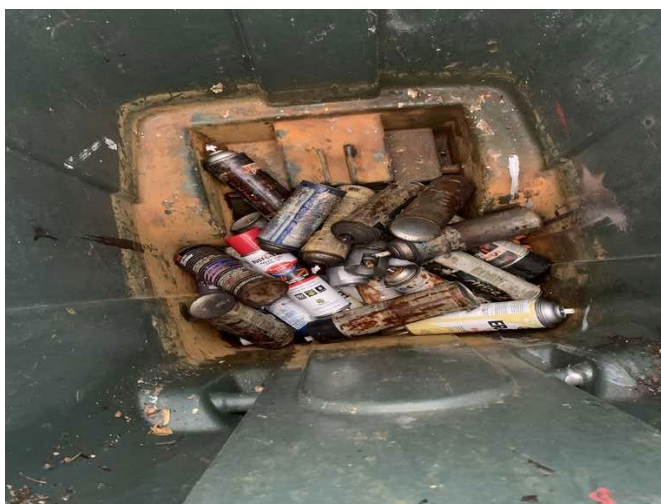


|                                                                               |                         |        |
|-------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                       | IMG_0063.jpg            |        |
| 09/29/2022 12:25 PM                                                           | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                    | No CBI                  | No PII |
| Another view of the SAA container of waste aerosol cans seen in IMG_0064.jpg. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                        |                         |        |
|------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                | IMG_0068.jpg            |        |
| 09/29/2022 12:29 PM                                                                                                    | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                             | No CBI                  | No PII |
| View of the label on the universal waste lamps tote, showing that it is improperly labeled as universal waste - bulbs. |                         |        |



|                                                                        |                         |        |
|------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                | IMG_0065.jpg            |        |
| 09/29/2022 12:26 PM                                                    | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                             | No CBI                  | No PII |
| View of the waste aerosol cans inside the waste aerosol SAA container. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                 |                         |        |
|---------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                         | IMG_0066.jpg            |        |
| 09/29/2022 12:26 PM                                                             | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                      | No CBI                  | No PII |
| Close-up view of the waste aerosol cans inside the waste aerosol SAA container. |                         |        |



|                                                                  |                         |        |
|------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                          | IMG_0073.jpg            |        |
| 09/29/2022 12:34 PM                                              | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                       | No CBI                  | No PII |
| View of the contents of the other open container of waste epoxy. |                         |        |

Inspection Date(s): 09/29/2022



|                                                          |                         |        |
|----------------------------------------------------------|-------------------------|--------|
| [Title]                                                  | IMG_0067.jpg            |        |
| 09/29/2022 12:28 PM                                      | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                               | No CBI                  | No PII |
| View of the labeling on the waste aerosol SAA container. |                         |        |



|                                                                                                                                                          |                         |        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                                  | IMG_0070.jpg            |        |
| 09/29/2022 12:30 PM                                                                                                                                      | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                                                               | No CBI                  | No PII |
| View of a 5-gallon container of universal waste batteries, on top of the universal waste lamps tote, that is mislabeled as universal waste button batts. |                         |        |

Inspection Date(s): 09/29/2022



|                                                 |  |                         |        |
|-------------------------------------------------|--|-------------------------|--------|
| [Title]                                         |  | IMG_0072.jpg            |        |
| 09/29/2022 12:34 PM                             |  | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                      |  | No CBI                  | No PII |
| View of the two open containers of waste epoxy. |  |                         |        |



|                                                                                                                                                     |  |                         |        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                                                             |  | IMG_0071.jpg            |        |
| 09/29/2022 12:34 PM                                                                                                                                 |  | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                                                          |  | No CBI                  | No PII |
| Another view of the open containers of waste epoxy. Only one of the containers is labeled with the words "Hazardous Waste", and marked with an ASD. |  |                         |        |

Inspection Date(s): 09/29/2022



|                                                             |                         |        |
|-------------------------------------------------------------|-------------------------|--------|
| [Title]                                                     | IMG_0077.jpg            |        |
| 09/29/2022 12:36 PM                                         | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                  | No CBI                  | No PII |
| View of the open container of waste flares seen in the CAA. |                         |        |

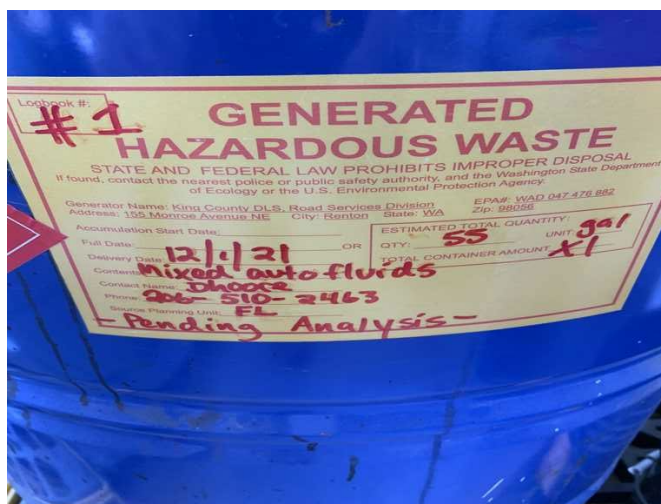


|                                                                        |                         |        |
|------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                | IMG_0078.jpg            |        |
| 09/29/2022 12:36 PM                                                    | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                             | No CBI                  | No PII |
| View of the waste flares seen inside of the open container in the CAA. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                    |                         |        |
|--------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                            | IMG_0075.jpg            |        |
| 09/29/2022 12:34 PM                                                | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                         | No CBI                  | No PII |
| Another view of the two open containers of waste epoxy in the CAA. |                         |        |

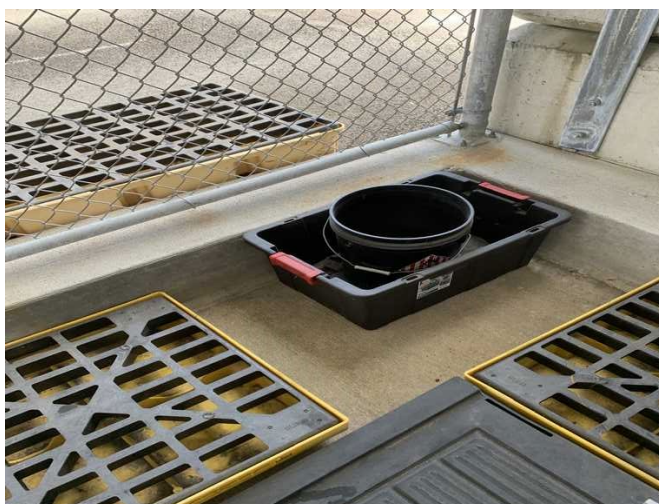


|                                                                                                                                                                                                        |                         |        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                                                                                | IMG_0080.jpg            |        |
| 09/29/2022 12:41 PM                                                                                                                                                                                    | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                                                                                                             | No CBI                  | No PII |
| View of the label on a container of mixed auto fluids that is also marked as "Pending Analysis." The date on the container indicates that the waste has been in accumulation for greater than 90 days. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                    |                         |        |
|--------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                            | IMG_0079.jpg            |        |
| 09/29/2022 12:41 PM                                                                                                | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                         | No CBI                  | No PII |
| View of the container holding waste auto fluids that has been in accumulation at the CAA for greater than 90 days. |                         |        |



|                                                       |                         |        |
|-------------------------------------------------------|-------------------------|--------|
| [Title]                                               | IMG_0076.jpg            |        |
| 09/29/2022 12:36 PM                                   | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                            | No CBI                  | No PII |
| View of an open container of waste Chlor-d-tect kits. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                |                         |        |
|----------------------------------------------------------------|-------------------------|--------|
| [Title]                                                        | IMG_0082.jpg            |        |
| 09/29/2022 12:43 PM                                            | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                     | No CBI                  | No PII |
| View of the waste Chlor-d-TECT kits inside the open container. |                         |        |



|                                                                         |                         |        |
|-------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                 | IMG_0081.jpg            |        |
| 09/29/2022 12:42 PM                                                     | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                              | No CBI                  | No PII |
| Close-up view of the label on the container of waste chlor-d-TECT kits. |                         |        |

Inspection Date(s): 09/29/2022



|                                                                    |  |                         |        |
|--------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                            |  | IMG_0083.jpg            |        |
| 09/29/2022 12:43 PM                                                |  | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                         |  | No CBI                  | No PII |
| Another view of the container of universal waste mercury switches. |  |                         |        |



|                                                                                   |  |                         |        |
|-----------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                           |  | IMG_0087.jpg            |        |
| 09/29/2022 12:50 PM                                                               |  | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                        |  | No CBI                  | No PII |
| View of two containers of orphaned waste in the CAA, each with an open bung hole. |  |                         |        |

Inspection Date(s): 09/29/2022



|                                                       |  |                         |        |
|-------------------------------------------------------|--|-------------------------|--------|
| [Title]                                               |  | IMG_0086.jpg            |        |
| 09/29/2022 12:50 PM                                   |  | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                            |  | No CBI                  | No PII |
| View of the orphaned waste containers inside the CAA. |  |                         |        |



|                                                                                                                                            |  |                         |        |
|--------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                                                    |  | IMG_0090.jpg            |        |
| 09/29/2022 01:00 PM                                                                                                                        |  | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                                                 |  | No CBI                  | No PII |
| View of the waste aerosol accumulation container inside the CAA that was not closed and had been in accumulation for greater than 90 days. |  |                         |        |

Inspection Date(s): 09/29/2022



|                                                           |  |                         |        |
|-----------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                   |  | IMG_0089.jpg            |        |
| 09/29/2022 12:51 PM                                       |  | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                |  | No CBI                  | No PII |
| Another view of the orphaned waste containers in the CAA. |  |                         |        |



|                                                                                                                           |  |                         |        |
|---------------------------------------------------------------------------------------------------------------------------|--|-------------------------|--------|
| [Title]                                                                                                                   |  | IMG_0088.jpg            |        |
| 09/29/2022 12:50 PM                                                                                                       |  | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                                |  | No CBI                  | No PII |
| View of the only orphaned waste container upon which a label with the words "Hazardous Waste" and an ASD had been placed. |  |                         |        |

Inspection Date(s): 09/29/2022



|                                                                                                                                                              |                         |        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                                      | IMG_0092.jpg            |        |
| 09/29/2022 01:00 PM                                                                                                                                          | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                                                                   | No CBI                  | No PII |
| Close-up view of the lid on the waste aerosol can accumulation container that is greater than 90 days old. This view shows that the container is not closed. |                         |        |



|                                                                                                                                                   |                         |        |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------|
| [Title]                                                                                                                                           | IMG_0093.jpg            |        |
| 09/29/2022 01:05 PM                                                                                                                               | Photographer: Jon Jones |        |
| Hazardous Waste Shed (CAA)                                                                                                                        | No CBI                  | No PII |
| Close-up view of the marking on the waste aerosol SAA container. The markings seen here indicate that the container has a capacity of 96 gallons. |                         |        |

Inspection Date(s): 09/29/2022

**APPENDIX 2: DOCUMENT LOG**

| Document Type                                              | Document Name                        | Contains CBI | Contains PII | Uploaded By | Date Received |
|------------------------------------------------------------|--------------------------------------|--------------|--------------|-------------|---------------|
| Records Review                                             | Mans-unsigned by Desfac.pdf          | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | WklyHWchecklists.pdf                 | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | JANUAR~1.PDF                         | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | FEBRUA~1.PDF                         | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | MARCH2~1.PDF                         | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | APRIL2~1.PDF                         | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | June 2022_Renton_final.pdf           | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | July 2022_Renton_final.pdf           | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | AUGUST~1.PDF                         | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | SEPTEM~1.PDF                         | No           | No           | Jon Jones   | 11/23/2022    |
| Other - Safety Data Sheet                                  | Traffic white paint 2020_current.pdf | No           | No           | Jon Jones   | 11/23/2022    |
| Other - Safety Data Sheet                                  | TRAFFI~2.PDF                         | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | 017187952FLE.pdf                     | No           | No           | Jon Jones   | 11/23/2022    |
| Records Review                                             | 017187953FLE.pdf                     | No           | No           | Jon Jones   | 11/23/2022    |
| Communications                                             | Documents email 10-5-22.pdf          | No           | No           | Jon Jones   | 11/23/2022    |
| Facility Map                                               | Renton Site Plan_Figure 1..pdf       | No           | No           | Jon Jones   | 11/23/2022    |
| Communications                                             | emailNarrative10.5.22.docx           | No           | No           | Jon Jones   | 11/23/2022    |
| Other - Photo of aerosol accumulation drum                 | AEROSO~1.JPG                         | No           | No           | Jon Jones   | 11/23/2022    |
| Other - Photo of lid and ring attached to drum             | AEROSO~2.JPG                         | No           | No           | Jon Jones   | 11/23/2022    |
| Other - Photo of flare, chlortect, and merc switch lids on | FLAREA~1.JPG                         | No           | No           | Jon Jones   | 11/23/2022    |
| Other - Photo of used oil container labeled as HW          | OILCON~1.JPG                         | No           | No           | Jon Jones   | 11/23/2022    |
| Other - Photo of relabeled UW tote                         | UNIVER~1.JPG                         | No           | No           | Jon Jones   | 11/23/2022    |
| Other - Photo of container with a newer haz ind. applied   | PU9FLA~1.JPG                         | No           | No           | Jon Jones   | 11/23/2022    |