EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	1/22/2026	
Media Program:	RCRA	
Regulatory Program(s)	Hazardous Waste Generator	
Company Name:	**Total Clean**	
Facility Name:	**Waxahachie Tank Wash**	
Facility Physical Location:	4306 IH 35E	
(city, state, zip code)	Waxahachie, TX 75165	
Mailing address:	4306 IH 35E	
(city, state, zip code)	Waxahachie, TX 75165	
County/Parish:	Ellis County	
Facility Phone Number	(972) 937-8118	
Facility Contact:	Kamran Rahimian	Manager/IT Manager
	[redacted]	
FRS Number:	110034348855	
EPA ID Number:	TXR000079176	
NAICS:	811192 – CAR WASHES	
SIC:		

Personnel participating in inspection:		
Erin Young-Dahl	U.S. EPA – Region 6	Inspector
John Penland	U.S. EPA – Region 6	Inspector
Kamran Rahimian	Total Clean/Heniff Transportation	Manager/IT Manager

EPA Lead Inspector Signature/Date	JOHN PENLAND Digitally signed by JOHN PENLAND Date: 2026.03.23 10:42:57 -05'00'	
	Erin Young-Dahl	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2026.03.23 11:13:22 -05'00'	
	Debra Pandak	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Erin Young-Dahl and John Penland arrived at the Total Clean Waxahachie Tank Wash (Total Clean or TCW) on January 22, 2026, for an announced inspection. At 8:35 a.m., the inspection team met with Mr. Kamran Rahimian, Manager and IT Manager for Heniff Transportation, who also oversees operations at the Total Clean tank washing facility. EPA inspectors presented credentials to Mr. Rahimian and informed him that they were there to conduct a Compliance Evaluation Inspection under the Resource Conservation and Recovery Act (RCRA), Statute 3007. The inspection included a records review as well as a walkthrough of on-site waste handling operations.

FACILITY DESCRIPTION

Total Clean operates a tanker truck cleaning facility. The facility can accommodate equipment that last carried food-grade products as well as certain approved chemicals and various hazardous wastes. Total Clean employs approximately 25 workers on-site, divided into three 12-hour work shifts during the work week. The facility operates 24 hours daily, Monday through Friday, but facility office hours are 8 a.m. – 4 p.m., Monday through Friday. The facility is registered as a Large Quantity Generator of hazardous waste for waste codes D001, D002, D003, D018, D021, D028, D039, D040, F001, F002, F003, F004, F005, and U190. In the past five years, however, the facility has only used waste coded as D001, D002, D018, and U190.

Total Clean services include interior tanker truck cleaning and, periodically, tote washing. Exterior services include truck cleaning and brightening. All trucks and totes are delivered and picked up by the customers. Out of the facility's six operational wash bays, one is dedicated to cleaning food and food-grade equipment, four enable use of the facility's flare as an air pollution control device, and one is not flare-enabled for unspecified loads (Appendix 2). The facility estimates wash capabilities of up to 40 tanker trucks per day.

Facility Operations

According to the facility's consolidated waste and heel management plan (Appendix 3), Total Clean requires that its customers empty the trucks prior to arrival. Any manifested loads of hazardous waste are required to be RCRA-empty, otherwise, the tanker truck is rejected. Upon arrival, Total Clean identifies the last-held contents of the trailer via manifest or SDS and approves or rejects the load based on their air and wastewater discharge permit caps. Rejections are largely due to the presence of listed chemicals or metals and non-water-soluble contents.

Once accepted, the trailer is emptied of any heel. The heel is drained and containerized and either sent back to the customer or shipped for disposal on a manifest or Bill of Lading with Total Clean listed as the generator. In some cases, Total Clean retains the heel to use for pH neutralization in their own flush and equalization tanks, used in wastewater processing. Trailers that previously held product chemicals or hazardous waste then receive an initial single-pass "pre-rinse" that is segregated from other

wastewaters, and is either containerized for reuse or disposal, or piped to the flush tanks as non-POTW-compatible wastewater. This POTW decision is made based on TCW's discharge permit allowances. Once heel management and/or pre-rinse processes are completed, a caustic or detergent cleaning solution is applied to the interior of the tanker via spinner and cycled in a closed loop for reuse. Once complete, the tanker is rinsed one final time, inspected, and set aside for pickup.

Section II - OBSERVATIONS

Wash Bays

Inspectors first toured wash bays 2 through 5, where Heniff tanker trucks were actively being washed (Appendix 1: Photos 1-3). Inspectors observed the central floor drain running longitudinally through the facility. The drain appeared to be functioning and properly draining rinsewater from single-pass rinses into a sump beneath wash bay 6. Between the wash bays, inspectors noted the presence of metal containers that were called "caustic vats," which hold the caustic solutions used in first pass washes of chemical trailers (Appendix 1: Photos 2, 3). Operators spray the high-pH caustic solution into empty trailers whose last-held contents consisted of chemical products or hazardous wastes. After rinsing, the used caustic mixed with the trailer residue, is containerized for potential reuse and placed in the waste storage area with "Acid Flush/Rinse/Wash" labeling. No specific timeline was provided to inspectors regarding usage, storage, and disposal of the accumulated acid rinse. Inspectors observed both closed-loop and single-pass washing practices and observed workers tipping a tanker back to emptying heel into a 5-gallon bucket hanging off the back of the trailer.

Inspectors continued through the wash bays toward the sump. A hopper filled with filter press sludge was staged in wash bay 5 (Appendix 1: Photo 4). Mr. Rahimian stated that the sludge is tested every three years and has never been flagged as hazardous. Just outside the secondary containment wall, still in wash bay 5, inspectors found several 5-gallon buckets of latex-based heels or drippings (Appendix 1: Photo 5). Next to this designated area, one drum of hazardous waste resin was staged on a pallet equipped with secondary containment (Appendix 1: Photos 5, 6). The drum was grounded and labeled with "flammable" placards and an accumulation start date of 12-20-25 (Appendix 1: Photo 7).

Tank Farm

Inspectors next walked around and within the tank farm operating in wash bay 6. The facility operates five tanks and one dissolved air flotation (DAF) unit in this area. Three 10,000-gallon tanks are designated equalization tanks, which store single-pass rinsewater that is pumped from the sump via a level-controlled pump. Once an equalization tank is full, a new tank is designated at the automated manifold, and rinsewater is then pumped into the new tank. In the equalization tanks, operators add caustic solution (aluminum sulfate) to raise pH ahead of DAF processing. From the equalization tanks, the rinsewater is processed through the DAF, where solids are filtered out. The remaining water is discharged through the facility's permitted outfall. TCW samples wastewater monthly to ensure compliance with their wastewater discharge permit.

The two other tanks were designated as flush tanks. Mr. Rahimian explained that the 8,500-gallon flush tanks hold any single-pass rinsewater that does not go through the water treatment process due to

POTW incompatibility. The tanks accumulate the flush water slowly, with an estimated eight years between disposal events. Prior to disposal, TCW samples the tanks to make a waste determination on the accumulated material. The last pre-disposal sampling, several years prior, resulted in the flush water flagging as corrosive. While TCW has the capability to control pH in the flush tanks with acid rinse and/or caustic vat material, TCW has not historically managed the flush tanks as elementary neutralization units and instead conducts toxicity characteristic leaching procedure (TCLP) testing prior to shipment.

Wash Bay 7/Loading Dock

Inspectors briefly observed conditions in designated wash bay 7 and the loading dock area. Several poly drums of unused DAF chemical flocculant were staged next to the tank farm in wash bay 7 for future use. In the loading dock area, inspectors identified multiple totes and poly drums containing various products actively used in the TCW cleaning process. Inspectors also noted limited (< 3 ft) aisle spacing. Several containers displayed “Materials for Recycle” stickers and dates of accumulation within the last year.

Waste Storage Area

The final area inspectors visited was the 90-day central accumulation area (CAA). The fenced-off cage was secured by key with notice placards affixed to the fence warning of the presence of corrosive and flammable materials. An inventory, dated January 21-22, 2026, was placed in a waterproof container on the fence. A fire extinguisher sat just outside the fence. Inspectors did not see any “No Smoking” signage (Appendix 1: Photo 8).

In the CAA, inspectors counted a total of 64 containers, including 34 totes, 22 poly drums, and 4 metal drums. Aisle space was limited and was generally less than 24” (Appendix 1: Photos 9-11). The four metal drums were labeled as “flammable liquids” with D001 hazardous waste codes (Appendix 1: Photos 12-14). The earliest accumulation start date labeled on one of these four drums was 10-31-2025 for a total accumulation time of 84 days. The remaining 60 poly containers contained various materials that were labeled as “materials for recycle,” and most were identified with “corrosive” shipping placards. The earliest accumulation date marked on these containers was February 5, 2025, however, 31 containers were undated. Materials included 34 partially full to full totes, 4 poly overpack drums, and 26 poly 55-gallon drums labeled “caustic vat,” “fuming nitric acid,” “acid wash,” “Petrofibe,” “Maquat,” acetone, and copper sulfate (Appendix 1: Photos 15-23). Two poly drums of acid wash appeared damaged: one with a broken and separated lid, the other with an apparent leak at the base of the drum causing deterioration of the wooden pallet beneath (Appendix 1: Photos 21-23).

TCW representatives stated the materials designated for recycling were collected in one of three ways: discarded heels from tanker trucks hauling chemical products, collected first-pass rinsewater from tankers carrying acidic chemical products (i.e., “acid flush/rinse/wash”), or used caustic solution emptied from the TCW caustic vats (i.e., “caustic vat” or “used caustic”). The caustic materials are reused as neutralizing agents in the three equalization tanks and the two flush tanks as well as closed-loop wash materials in emptied tanker trucks.

Section III – AREAS OF CONCERN (AOCs)

1. 40 C.F.R. 262.11 (Waste Determination): A person who generates solid waste, as defined in 40 CFR 261.2, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure waste is properly managed according to applicable RCRA regulations. *The facility failed to make a waste determination at the point of generation on washwater intended to be transferred to the flush tanks on-site.*
2. Container Management
    a. 40 CFR 264.17(a) (Ignitable Wastes): "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste. *The facility failed to place "No Smoking" signs near the central accumulation area, where ignitable wastes were being stored.*
    b. 40 CFR 262.255 (Aisle Spacing): The large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. *The facility failed to maintain adequate aisle spacing within the central waste accumulation area to allow for unrestricted access to containers.*
    c. 40 CFR 264.171 (Condition of Containers): If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of this part. *The facility failed to transfer hazardous waste in two containers in poor condition to containers in good condition.*
    d. 40 CFR 264.174 (Inspections): At least weekly, the owner or operator must inspect areas where containers are stored. The owner or operator must look for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. *Operators failed to conduct inspections to identify two containers in poor condition, one of which appeared to be leaking.*
    e. 40 CFR 264.177(c) (Incompatible Storage): A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device. *Four hazardous waste drums containing D001 hazardous wastes were not separated by a dike, berm, or wall from incompatible corrosive materials also found in the waste storage area.*
3. 40 CFR 261.1(c)(8) (Speculative Accumulation): A material is "accumulated speculatively" if it is accumulated before being recycled. A material is not accumulated speculatively, however, if the person accumulating it can show that the material is potentially recyclable and has a feasible means of being recycled; and that—during the calendar year (commencing on January 1)—the amount of material that is recycled, or transferred to a different site for recycling, equals at least 75 percent by weight or volume of the amount of that material accumulated at the beginning of the period. *The facility failed to demonstrate that 75% of the accumulated waste from operations were recycled within the calendar year.*

Closing Conference

EPA Region 6 inspectors Erin Young Dahl and John Penland conducted a closing conference at Total Clean – Waxahachie Tank Wash at 2:00 p.m. on 1/22/2026. During the closing conference, the inspection team reviewed the seven areas of concern noted during the inspection, fielded questions from facility personnel, and provided information about the next steps in the inspection process. Additionally, AOC (2e) was determined after the conclusion of the inspection and was not included in the closing conference.

Section IV – FOLLOW UP

The following information was received by EPA on January 28, February 12, and March 12, 2026:

- Waste profiles
  - Rinsate
  - Hello
  - Sludges
- Safety Data Sheets for chemicals in active use
- Training records
  - Program materials
  - Employee completion records
- Inspection checklists for waste and chemical storage area (2025 – present)
- Standard operating procedures
  - Tanker cleaning
  - Heel and waste removal
  - Waste determination process
- Contingency plan

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 23 photos taken 1/22/2026

Appendix 2 – Facility Map

Appendix 3 – General Facility Information part of Consolidated Waste and Heel Management Summary Plan

Appendix 4 – Outdoor Chemical Cage Inventory Sheet

Appendix 2

Facility Map

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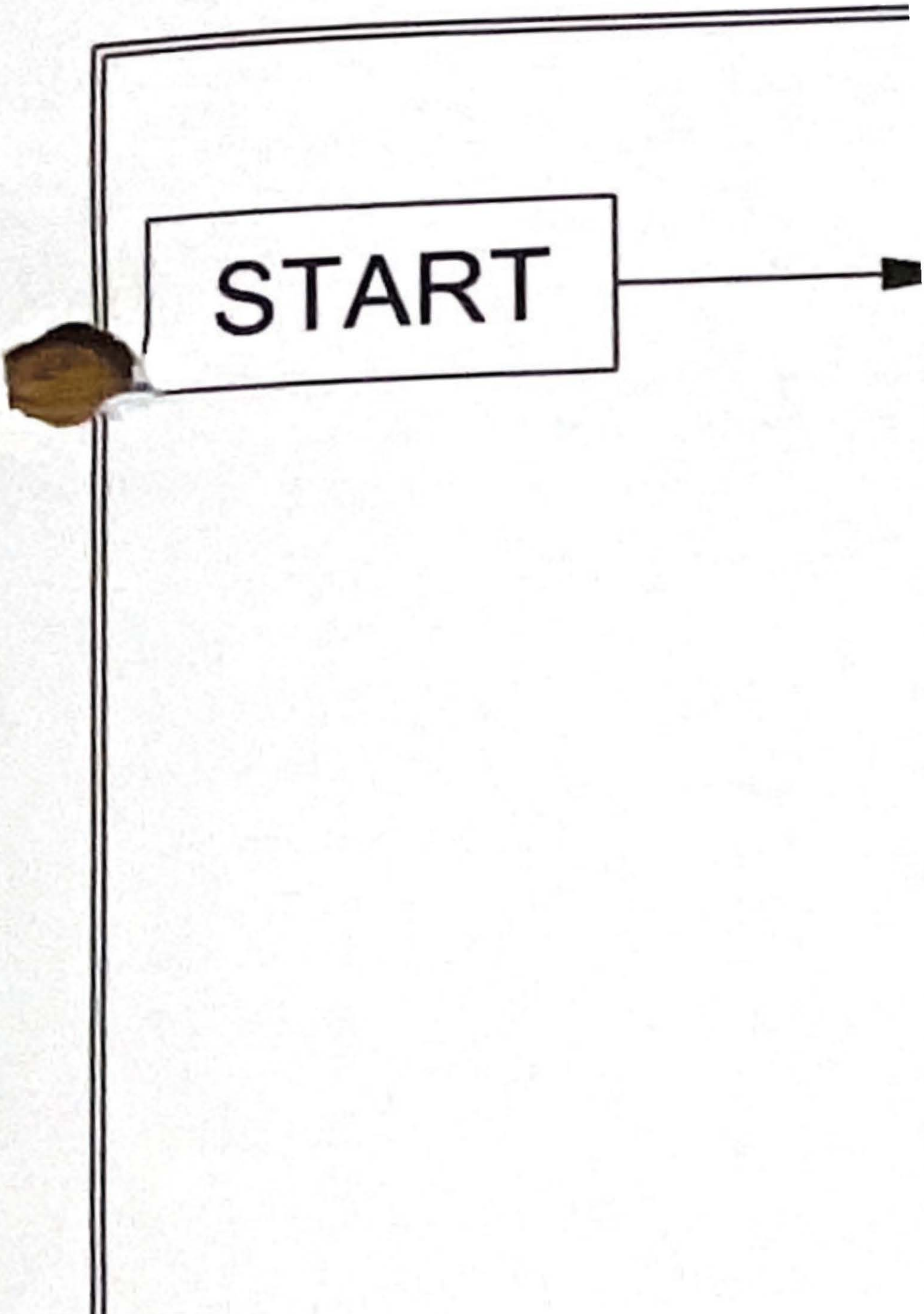
Appendix 3

Excerpt from Consolidated Waste and Heel Management Summary Plan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Introduction

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Outdoor Chemical Cage inventory sheet

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Appendix 5

Daily Summary (1/22/2026)

Good morning,
Here is a summary of my notes from yesterday's inspection. If there are any errors or omissions, please let me know.

Introduction
On January 22, I, Erin Young-Dahl, conducted an announced inspection of the Total Clean Waxahachie Tank Wash facility, located at 4306 IH 35E in Waxahachie, TX, for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by John Penland. The inspection included a walkthrough of the tank washing operations site and waste storage area as well as a records review.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Erin Young-Dahl	Physical Scientist – Lead Inspector	US EPA Reg. 6	(214) 665-3166	youngdahl.erin@epa.gov
John Penland	Sr. Environmental Scientist – Asst. Inspector	US EPA Reg. 6	(214) 665-9717	penland.john@epa.gov
Kamran Rahimian	Manager/IT Manager	Heniff/ Total Clean	(214) 282-5825	[redacted]

Summary:

- Provided notification of inspection at 8:30 am on January 21, 2026.
- Entered facility at 8:35 am on January 22, 2026.
- Opening meeting start at 8:45 am.
    - Presented credentials to Mr. Kamran Rahimian and informed him we were there to conduct an inspection under the authority of RCRA Section 3007.
    - Discussed the purpose and goals of the inspection – assessment of Total Clean's compliance with its responsibilities under RCRA, including: waste determination, container management, recordkeeping, personnel training, and emergency planning.
    - Discussed the right of Total Clean to assert Confidential Business Information (CBI) claim for records requested by EPA.
    - Discussed the process for exchange of electronic records – EPA to set up a OneDrive folder with access limited to inspection participants only.
- General Facility Process – Total Clean is a tank washing facility that specializes in tanker truck washing. The facility can manage both food-grade and chemical/waste trailer washes. Total Clean is registered with EPA as a Large Quantity Generator of hazardous waste under EPA ID # TXR000079176. The facility has been in operation as a tank washer since 2008 as DFW Tank Cleaners but most recently changed hands in 2022 to Total Clean in cooperation with Heniff Transportation Systems, LLC.
- Initial request for compliance records:
    - Facility map (RECEIVED)
    - Facility process diagram(s) for any process that generates waste
    - SOPs for:

        - Heel management
        - Hazardous waste management
        - Waste and/or chemical product trailer cleaning
    - Training records for employees (5 years)
    - On-the-job training checklist for new hires
    - (most recent) waste determinations for:
        - Flush tank
        - Flush tank sludge
        - Equalization tank sludge
        - Filter press solids
    - Weekly hazardous waste storage area inspection checklists (3 years)
    - Contingency plan
- Facility walkthrough – began at 10:30 am
    - EPA inspectors, accompanied by Mr. Rahimian, toured the Total Clean facility.
    - Areas of interest:
        - Wash bays
            - Six active wash bays (numbered 1-5, 7)
            - Wash bay 1 is dedicated to food-grade washing only
            - Wash bay 6 is occupied by the tank farm
            - Drain runs longitudinally along the floor of the tank wash building. All wash bays slope inwardly to the drain, which directs rinsewater towards a sump beneath wash bay 6
            - Two types of rinses: closed rinse (closed loop between tanker and caustics vat) and single pass rinse (tank is rinsed and water drained to the sump)
            - One hazardous waste drum in a satellite accumulation area labeled as “flammable liquids” with a December 2025 accumulation start date
        - Tank farm
            - Three equalization tanks (ea. ~10,000 gal) designated for single-pass rinsewater from the sump, filled by a level-controlled pump
                - Wastewater for discharge is tested monthly per city discharge permit.
                - Tank sludge is tested every three years.
                - Equalization wastewater is run continuously through a dissolved air flotation (DAF) unit, then through a filter press and discharged. Filter press solids are containerized and shipped offsite for disposal as non-hazardous waste.
            - Two flush tanks (ea. ~8,500 gal) designated for “undesirable” washwater that the facility does not wish to have in their wastewater treatment system (e.g., some chemicals, food items, materials containing metals).
                - pH-controlled with recycled caustics – managed as an elementary neutralization unit
                - Historically has taken ~ 8 years to fill and ship out
        - Loading dock

        - Storage of products used in the cleaning process.
        - Noticed limited (< 3ft) aisle spacing
    - Waste storage area
        - Counted 64 containers (drums, totes, overpack containers)
        - 4 drums of flammable liquids were labeled as hazardous waste. The oldest accumulation start date was 10/31/2025.
        - The other 60 containers held various caustic solutions that were being kept on hand to neutralize pH in operations or wastewater treatment. Contents included: acid rinse, Petrofibe, Marquat, caustic, copper sulfate, and fuming nitric acid. All inspected containers were at least partially full.
            - 31 of these containers were undated. The oldest date listed was from January 2025 (approx. 1 year)
        - Two poly drums were compromised. One had a cracked and separated lid, and the other appeared to have a leak at the bottom of the container that had released a caustic substance that had started to crystallize and react with the wooden pallet underlying the drum.
        - Aisle spacing was < 3 ft.
        - Drums largely appeared to be closed and in good condition. Spill kit was nearby, the area was well-placarded, and an inventory sheet posted just outside the cage had just been updated the night before.
    - Total Clean office
        - Inspectors met with Mr. Joe Svehlak and discussed the Total Clean training program, SOPs, and wash records.
- Closeout meeting with Mr. Rahimian. Reviewed observations and outstanding document requests.
- Departed facility at 3:00 pm