REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

UNITED PARCEL SERVICE (UPS)
1224 W 76th Street
Davenport, Iowa 52806
888-742-5877 Installation Phone Number
612-470-7877 Site Contact Phone Number

EPA ID Number IAD984618389

On

June 14, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at UPS, Davenport, Iowa. The inspection was conducted on June 14, 2022. The CEI was conducted under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the CEI. Based on the information obtained during the inspection, I inspected UPS as a small quantity generator (SQG) of known hazardous waste (HW), a small quantity handler of universal waste (SQHUW) lamps, and a generator of used oil. According to the U.S. Environmental Protection Agency (EPA) RCRAInfo database, the facility had been previously inspected by the EPA on March 4, 1998, with no findings noted.

2.0 PARTICIPANTS

UPS:

Sam Nielsen, Plant Supervisor, (8 years with UPS) – snielsen@ups.com, 319-504-9971
Shawn Koch, Business Manager, (15 years with UPS, 2 years in role)
Brian Arlt, Hazmat Porter (31 years with UPS)
Alyssa Kronfeld, Health and Safety (8 years with UPS)
Carl Wirt, Customer Service
Pat Roling, Mechanic (19 years with UPS)

EPA:

Mark Holcomb, Civil Investigator (SEE) (Lead Inspector)
Tim Evans, Environmental Scientist (Training Preceptor)

3.0 INSPECTION PROCEDURES

On June 14, 2022, Mr. Evans and I arrived unannounced at the facility's main entrance at about 0900 hours. Initially I conducted a visual reconnaissance of the building/facility searching for areas of concern observable from the adjacent public roadway and parking lot. This is a large facility with perimeter security fencing and a staffed security gate. I identified no environmental issues or concerns during this preliminary examination. Inside the front door of Customer Service, we met with Carl Wirt with Customer Service. I introduced myself and I asked to speak with Amy Steinbach (Ms. Steinbach was listed on the EPA Notification Verification Report as the Site Contact, but her address is in a different state). Mr. Wert contacted Shawne Koch. When Ms. Koch arrived, she stated that she was the facility Business Manager and not an expert on hazardous waste, but that she would do the best she could to show us around. Ms. Koch also contacted and introduced us to Brian Arlt, who is one of the hazmat porters. After introductions she escorted us to nearby by conference room. Ms. Koch stated that she had been with UPS for over 15 years with two years in her current business manager role. Ms. Koch told us there were currently no specific COVID-19 staff or visitor requirements and the only safety personal protective equipment (PPE) requirements at this facility were safety shoes, and safety vest.

At the opening conference, I again introduced myself and presented my EPA ID. I also introduced my colleague Mr. Evans. I explained that I was the lead investigator, but I was also in training and that Mr. Evans was my trainer and our credentialed inspector. Mr. Evans presented his credentials. I explained the purpose and procedures of the inspection. I presented Ms. Koch with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented her with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I made her aware of her confidentiality rights and informed her that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if she so desired. Ms. Koch stated that she had contacted Sam Nielsen, the Regional Plant Supervisor, to see if he could come in to meet with us since he is manager of their safety/health and hazardous waste program. She mentioned that Mr. Nielsen was currently off-site since he managed several locations and was not expected at this facility until later that evening, but he indicated he would come in early. Mr. Nielsen arrived in the afternoon around 1:00 PM, along with Alyssa Kronfeld (Health & Safety), and took over as our lead contact for UPS.

The RCRA inspection consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records. Ms. Koch was present throughout the entire inspection including the visual inspection. Ms. Koch was also present for the opening and exit conferences. Mr. Nielsen, arrived in the afternoon and was present for a 2nd visual inspection of key locations, additional document reviews, and was present for the closing conference.

I conducted a visual inspection of the following:

- General facility
- Northeast corner of facility – Hazardous Waste Cage – Damaged Material Processing (DMP)
- Northeast corner of building (outside) two metal shipping containers converted into storage rooms – also referred to as the satellite accumulation area (SAA) and central

accumulation areas (CAA)
- Mechanic's Bay on west side of facility
- Outside southwest corner of building – dumpsters
- Area 5 (fluorescent lamps)
- Outside of northeast corner of facility near SAA/CAA

See Attachment #1 the aerial and map views of the facility and Attachment #2 for a facility diagram.

Document Photocopies and Photographs were collected as inspection documentation (see Attachments # 1-14 and Photos 1-34). The photo log is included in Attachment #3. Information collected during the inspection is documented on an Entry/Exit checklist, the hazardous waste compliance checklists and in a notebook. I reviewed documents including the following: Safety Data Sheets (SDS); bills of lading; certificates of recycling; waste profiles; manifests; contingency plan; and staff training records.

On the afternoon of June 14, 2022, I held a closing conference. Participants included Mr. Nielsen, Ms. Kronfeld, Ms. Koch and Mr. Evans. I provided Mr. Nielsen with a Receipt for Documents (see Attachment #4) and a Confidentiality Notice (CBI) (see Attachment #5) which he signed as acknowledgement of receipt. No confidential business information (CBI) claims were made. I summarized my findings and recommendations and provided Mr. Nielsen with a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment #6). I provided inspection and compliance assistance documents during the inspection, some as paper versions and some in electronic PDF via email, that included the following:

- *RCRA Section 3007(a)*
- *Title 18 U.S. Code, Sections 1001 and 1002*
- *Confidentiality Notice (Top page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections Receipt for Documents and Samples*
- *Notice of Preliminary Findings (NOPF) with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a Notice of Preliminary Finding (NOPF) (EPA Handout)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (IDNR Handout)*
- *Lead-Based Paint Activities (IDNR Handout)*
- *Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)*
- *Battery Recycling/Disposal (IDNR Handout)*
- *Management of Fluorescent Lamps for Businesses (IDNR Handout)*
- *Incompatible Chemicals (IDNR Handout)*
- *Universal Wastes Including Aerosol Cans (IDNR Handout)*
- *TCLP Waste Determination Testing (IDNR Handout)*
- *Industry Sector Notebooks (EPA Handout)*
- *Environmental Compliance Assistance Centers (EPA Handout)*

- *e-Manifest Fact Sheet (EPA Handout)*
- *RCRA Online A Quick Reference Guide (EPA Handout)*
- *Requirements for Used Oil Management Standards (EPA Handout)*
- *Emergency Response Program (EPA Handout)*
- *Commercial Motor Vehicle Transportation System Security & Safety*
- *Security Awareness (EPA Handout)*
- *Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)*
- *Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business*

I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure (SOP) 2321.01D, unless noted otherwise.

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Ms. Koch stated that this facility location began operations in 1976. UPS has approximately 360 employees (including 80 drivers, 65 pre-loaders, and eight mechanics), and operates 24 hours per day, six days per week. The facility is approximately 78,000 square feet. UPS is privately owned by the same owner and operator of the facility, the American Messenger Company based in Seattle, Washington. See Attachment #1 for the facility aerial view and map location. UPS is a Fortune 500 multinational shipping & receiving and supply chain management company founded in 1907.

4.2 Facility RCRA Status

RCRAInfo listed any previous RCRA compliance inspections for UPS on March 4, 1998, with no findings reported. According to the RCRAInfo Notification Acknowledgement/Verification Report, UPS last notified as a Small Quantity Generator (SQG) on February 15, 2022. I verified the Notification Acknowledgement/Verification form with Mr. Nielsen with no changes made (see Attachment #7). The RCRAInfo Notification Acknowledgement/Verification form report listed **"*All-D, All-F, All-U, and All-P waste codes***", with the explanation: **"*All waste codes are listed due to the nature of hazardous waste generation at this site. The nature of business results in damaged packages, which results in waste codes varying from year to year.*"** UPS appears to be a small quantity generator (SQG) of hazardous waste (greater than 100 kg or 220 lbs and less than 1000 kg or 2200 lbs. of non-acute hazardous waste generated per month), based on the facility's hazardous waste generation rate at the time of the inspection. In addition, UPS appears to be a handler of universal waste lamps, and a used oil generator.

4.3 Facility Waste Streams and Management

The following waste streams are managed by UPS:

Various Hazardous Wastes – a large variety of hazardous wastes are generated in small quantities as part of UPS's **Damaged Material Processing** (DMP) program. Damaged product containers are brought to the "DMP Cage" located in the northeast corner of the

facility (see Photos 2-7 and the facility diagram in Attachment #2). Photo 1 is an inside view of the facility facing east taken from the west side of the facility. The DMP Cage is on the far left. Inside the DMP Cage are detailed instructions and a Decision Tree on how the damaged product is to be packaged and processed on the bulletin board and notebooks inside the DMP hazardous waste Cage area (see Photo 5). The proper SDS is acquired. Initially potentially hazardous waste containers are double wrapped in green plastic, labeled as "poison", and placed in a gray plastic tub and placed on the shelf (see Photo 6). Mr. Nielsen stated that all bagged damaged products must be processed within 48 hours, and most are processed the same day, by staff trained in the DMP process. This is the point of "generation" of the hazardous waste. Detailed information on the waste being processed is filed in the filing cabinet and the green bagged hazardous waste is sorted by their Decision Tree process and placed in the proper hazardous waste satellite accumulation area (SAA) drum located in the SAA/CAA storage area, which are two metal shipping containers converted into storage rooms (see Photos 8-20 and 30-33). Also see the facility diagram in Attachment #2. Inside the SAA storage rooms are 30-40 55-gallon drums (some are listed as non-regulated or non-hazardous waste). The drums in the SAA room are all satellite drums and have the top bolt removed and have a temporary quick release top attached. Each drum is for a different class/type of chemical product. They keep adding the damaged products one bag at a time as needed until the drum is full or near full, at which time the quick release lid is removed and the standard drum top is bolted closed. The full drum is dated as full and moved to the CAA storage room next door (north metal storage container).

To review the amount of hazardous waste generated monthly, I asked Mr. Nielsen for a monthly report. He was able to generate an Excel report on his laptop for the past several years that showed that UPS's month hazardous waste generation falls well within the 100 kg to 1000 kg (220 lbs – 2200 lbs) each month for a SQG, though it does vary somewhat, I did not see any months that exceeded the 1000 kg (2200 lbs) that would push them into the Large Quantity Generator (LQG) category. To get a rough estimate of monthly generation rates, I used the March 29, 2022 manifest and the eManifest report to see the amounts shipped between their three-to-four-month pickup/transports by Veolia Environmental Services between May 10, 2021 and March 29, 2022. The estimated monthly hazardous waste generation amounts ranged between 335 lbs and a high of 758 lbs per month.

UPS uses Veolia Environmental Services to transport their full hazardous waste drums. The March 29, 2022 manifest (see Attachment #8) shows this shipment going to Veolia Technical Solutions in Menomonee Falls, Wisconsin, and the December 16, 2019 manifest (see Attachment #9)) shows this shipment going to Veolia ES Technical Solutions in Sauget, Illinois. There are no waste codes listed on the March 29, 2022, manifest. The waste codes on the December 16, 2019, manifest are: D001, D003, and P098. The P098 waste code was for UN3413 Waste Potassium Cyanide Solution and is listed as five pounds on the manifest. I asked them to confirm this since any acute P waste over one kg (2.2 lbs.), in one month, would push them into the Large Quantity Generator (LQG) status for that month. Mr. Nielsen looked it up in their database and stated that he was sure that the actual waste weight was less than 2.2 pounds, with the majority of the five pounds listed on the manifest being the extra weight of the container and packaging.

The off-site management varies based on what hazardous waste is shipped and where it is shipped to. The March 28, 2022, shipment appears to be all H141 (storage and transfer) management codes, and the December 16, 2019, shipment appears to be H040 (incineration) management codes.

During the visual inspection, I observed the SAA/CAA was located outside of the facility building inside of two metal container boxes converted to storage rooms. The rooms were connected by a door. Both rooms had portable fire extinguishers and there was an emergency alarm switch just outside of the main door (see Photos 30 and 31). The southern storage room, I am referring to as the SAA, had over 30 55-gallon drums, all of which were satellite SAA drums of different waste streams, that were still in use. Each had a quick release top to facilitate opening and closing. I observed that three of the drums had quick release lids that were not fully secured (see Photos 12, 15, 16, 17). This was resolved during the inspection. I observed the funnel lids on the two 55-gallon drums of liquid paint waste in Photos 13, 14, 18) were also not secured – this was also resolved during the inspection. The northern metal storage room, I referred to as the CAA, had more SAA drums in it than CAA drums. In Photo 11, the SAA drums are on right side of isle, they are only partially full, and most had a quick release top. The CAA drums on left side were full, bolt clamped shut, and ready for shipping (all are labeled as "Non-Regulated Waste", non-hazardous). The drums were in good condition and properly labeled. I did not observe any full hazardous waste CAA drums ready for shipping. Their last shipment was on March 29, 2022, roughly three months earlier, and it appears that all their hazardous waste drums were still in the "accumulating" SAA phase. This inspection was on a hot sunny day, with an outside temperature around 90 degrees F. The inside temperature in these metal rooms was probably at least 110 degrees F and too hot to stay inside for more than a few minutes.

- **NOPF 2: Failure to keep SAA containers closed when not added waste as required in 40 CFR 262.15(a)(4)**

Concerns/Discussion:

- **SAA Area location**: *40 CFR 262.15 states that the SAA containers must be at or near the point of generation, which is under the control of the operator of the process generating the waste.* Ms. Koch stated that at this facility the point of generation occurs where the hazardous waste determination is made, which is in the DMP Cage area just inside the building. There are two doors to go through to get from the hazardous waste DMP Cage to the SAA located in the outside, attached, SAA/CAA rooms. The total distance is approximately 25 feet. In photos 30-33, I demonstrate the distance and route from the hazardous waste DMP Cage to the SAA. Also, see the facility layout diagram in Attachment #2. At the time of the inspection, I did not list this as a finding, but it may warrant additional EPA follow-up.

- **SAA Definition**: *40 CFR 262.15 states that a generator may accumulate as much as 55-gallons of non-acute hazardous waste in a SAA.* Any one of these 30 plus SAA 55-gallon drums could potentially fully meet or exceed this regulatory amount. Since they handle potentially many different types of hazardous waste items (using all D, F, U, and P waste codes), results in having multiple SAA containers. The regulation

also does not state the size of the SAA, so I considered each drum to be its own SAA. Both of these rooms could also be considered one CAA. At the time of the inspection, I did not list this as a finding, but it may warrant additional EPA follow-up.

- **Incompatibles in the SAA/CAA**: *40 CFR 262.15(a)(3)(iii) states that incompatible waste must be separated from other nearby materials or protected from them by any practical means.* Photo 10 shows two 55-gallon drums stored next to each other in the SAA, one labeled as "flammable solid" and the other labeled as an "oxidizer". I opened both drums and each had only one item (less than 1/5 full), double wrapped in green plastic, setting on top of an absorbent pad. Both drums appeared to be in good condition with no obvious leaks or damage. The oxidizer was listed as 8-20% hydrogen peroxide. I do not recall what the flammable solid was. At the time of the inspection, I did not list this as a finding, but it may warrant additional EPA follow-up.

- **Heat in the SAA/CAA**: *40 CFR 262.16 (b)(8)(i) states that a generator must maintain or operate its facility to minimize the possibility of fire, explosion, or any unplanned sudden release of hazardous waste*. At the time of the inspection, it was a sunny summer day in the high 90's. It was too hot inside of the metal storage containers (SAA & CAA) to remain for more than a few minutes. At the time of the inspection, I did not review all the containers and contents due to the heat. I did not list this as a finding, but it may warrant additional EPA follow-up.

Used Oil - Pat Roling, mechanic in the Mechanics Bay, stated that the used oil waste stream is generated as part of the UPS vehicle oil change maintenance process. Mr. Roling estimated that they generate about 150 gallons of used oil per month. The used oil is collected in the area noted in Photo 23 and stored in the 250-gallon tank shown in Photo 21. The tank and collection port are labeled with "Used Oil". They consider the used oil to be non-hazardous based on process and product knowledge. The used oil is pumped out and transported monthly by Growmark to Jebro Inc. in Sioux City, Iowa for recycling. See Attachment #10 for the non-hazardous waste used oil Manifest.

Used Oil Filters – Mr. Roling stated that they generate about ½ of a 55-gallon drum of spent crushed oil filters per month. The oil filters are crushed in the oil filter crusher in Photo 24 and allowed to drain for 24 hours. The drained oil goes into the used oil tank. Once empty, the oil filters are collected in a drum and shipped approximately every two months by Growmark to Jebro Inc. in Sioux City, Iowa for recycling as scrap metal.

Pit Sludge – Pit sludge is pumped from the drains in the maintenance area. Mr. Roling stated they have the pit sludge pumped out quarterly. See Attachment #11 for the non-hazardous waste Manifest from Omaha Pumping in Gretna, Nebraska. The December 13, 2019, manifest shows 2400 gallons pumped from: interior drain sediment, oil/water separator sediment, and car wash drain sediment. They consider the pit sludge to be non-hazardous based on process and product knowledge.

Spent Parts Washer Fluid - Mr. Roling stated that they generate spent parts washer solvent in the maintenance area, which is used to remove oil and grease from parts, and that no other solvents were used. Mr. Roling stated that they use five-gallon containers of Zep Dyna 143 Parts Washer Solvent. Their waste determination is that this is non-hazardous based on product knowledge – it has a flash point of 143 deg F verses the less than 140 deg F threshold for D001 ignitability. During the visual inspection I did not see the parts washer or parts washer solvents.

Spent Lamps – Mr. Nielsen stated UPS had previously switched over to all LED lamps. During the visual inspection, near Area 5, I observed one box of four-foot spent florescent lamps in an unlabeled, undated, open box containing about 20 spent lamps (see Photo 28). Mr. Nielsen stated that they treat the spent lamps as universal waste and staff must have missed this box. Mr. Nielsen stated these spent lamps had been accumulating since February 8, 2022. This was corrected at the time of the inspection. The 20 lamps were placed in a shipping box designed for spent lamps, properly labeled, dated, taped closed, and sent for shipment via UPS to Waste Management for recycling (see Photo 34).

- **NOPF 3: Demonstrate length of time Universal Waste lamps have been accumulating as required in 40 CFR 273.15(c)**

- **NOPF 4: Keep Universal Waste lamps in closed container as required in 40 CFR 273.13(d)(1)**

- **NOPF 5: Label containers with "Universal Waste Lamps", or "Waste Lamps", or "Universal Lamps" as required in 40 CFR 273.14(e)**

Cloth Shop Rags – Mr. Roling stated that they generate about one bag of soiled cloth shop rags per week or about 200 rags. Onsite the rags are collected in a closed top step can and are picked up and transported to Aramark weekly for laundering. The rags are potentially contaminated with oil and grease. Mr. Roling stated that the only solvent they routinely use is Brakleen (see Attachment #12 for the Brakleen SDS). He also stated that to his knowledge, they have not done a hazardous waste determination on the soiled rags. At the time of the visual inspection, I observed one red 15-gallon waste step can in the main shop (see Photos 25, 26). The rags appeared dry to touch. The step can was full and had a cloth bag liner.

- **NOPF 1: Failure to make waste determinations on the cloth rags, as required in 40 CFR 262.11(a)**

Antifreeze – Mr. Roling showed me their antifreeze recycling unit (see Photo 22). Mr. Roling stated the antifreeze is reclaimed and reused – and there was no waste generated.

Paper and Cardboard – UPS generates general office recyclables such as paper and cardboard from packaging of parts and office operations. Ms. Koch was unsure of their generation rate but stated that three or the four four-cubic yard dumpsters are for recyclables (see Photo 27). It is collected weekly by Millennium Waste Inc (MWI). During the visual inspection I observed the three recyclable dumpsters to be about ¾ full, empty, and empty.

General Trash – General trash is generated by routine business operations. Ms. Koch stated the trash consists of paper and plastic shipping wastes and general office wastes and that it is non-hazardous. Their general trash is placed into a four-cubic yard dumpster (see Photo 27), which is collected weekly by Millennium Waste Inc (MWI) and transported to the local Davenport landfill. During the visual inspection I observed the one general trash dumpster to be about 1/5 full.

4.4 Other Regulatory Requirements

Outside Facility Perimeter - I did a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks and containers except as noted above. The UPS building is a single 78,000 square foot structure on a 22-acre lot with a manned security gate located on the southeast corner of the lot. I did observe security fencing around the facility. See the aerial view in Attachment #1.

Central Accumulation Area (CAA) – The CAA is located outdoors in the northeast corner of the facility inside of two metal cargo shipping containers converted to storage rooms. They conduct weekly inspections and document this on checklists in a three-ring binder located on the desk in the DMP hazardous waste cage processing area (see Photo 29). See the above Various Hazardous Wastes and Concerns/Discussion sections for additional comments regarding the CAA.

Preparedness and Prevention – UPS has numerous fire extinguishers throughout the facility as well as a sprinkler system that covers most of the facility with the exception of the SAA/CAA. They have a detailed contingency plan and involve the appropriate emergency agencies, as well as conduct an annual local fire department walk through inspection. I observed a fire hydrant located on the outside southeast corner of the building less than 100 feet south of the SAA/CAA rooms. One concern noted was that the required posting of emergency contact numbers/emergency information, which was located on the bulletin board inside the DMP hazardous waste cage area, was partially blocked by other documents that had been posted on the same bulletin board – note this was quickly corrected at the time of the inspection and was not listed as a finding.

Personnel Training – It appears that all "responders" involved in handling of hazardous waste undergo adequate initial and recurrent training. See Attachment #13 for the outline of their initial responder training workbook and see Attachment #14 for a list of responders and their training dates.

5.0 SUMMARY OF FINDINGS

NOPF 1: Failure to make waste determinations on cloth rags contaminated with solvent, as required in 40 CFR 262.11(a)

NOPF 2: Failure to keep SAA containers in the CAA closed when not added waste as required in 40 CFR 262.15(a)(4)

<u>NOPF 3</u>: Demonstrate length of time Universal Waste lamps have been accumulating as required in 40 CFR 273.15(c)

<u>NOPF 4</u>: Keep Universal Waste lamps in closed container as required in 40 CFR 273.13(d)(1)

<u>NOPF 5</u>: Label containers with "Universal Waste Lamps", or "Waste Lamps", or "Universal Lamps" as required in 40 CFR 273.14(e)

Other than the items specifically noted in this narrative, I observed no additional issues or potential findings. However, further EPA review may change or add to my findings.

MARK HOLCOMB (Affiliate) Digitally signed by MARK HOLCOMB (Affiliate) Date: 2022.08.04 10:45:47 -05'00'

Mark Holcomb
Civil Investigator

AMBER WHISNANT Digitally signed by AMBER WHISNANT Date: 2022.08.05 18:57:58 -05'00'

Amber Whisnant
RCRA Section Chief, ECAD/CB

<u>Attachments:</u>

1. Facility Aerial View (2 pages)
2. Facility Diagram
3. Photo Log (34 photos /17 pages)
4. Receipt for Documents (1 page)
5. Confidentiality Notice CBI (l page)
6. Notice of Preliminary Findings NOPF (1 page)
7. EPA RCRA Notification Acknowledgement/Verification Report (2 pages)
8. Manifest 3.29.2022 (2 pages)
9. Manifest 12.16.2019 & LDR (3 pages)
10. NH Manifest- Used Oil (1 page)
11. NH Manifest- Sediment Pit Sludge (3 pages)
12. SDS Brakleen (10 pages)
13. Training Outline (1 page)
14. Staff Training List (1 page)