

Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Plaza Provision - Guaynabo
 PRR000027847

US Environmental Protection Agency – Region 2
 Caribbean Environmental Protection Division (CEPD)
 Response and Remediation Branch (RRB)



Resource Conservation and Recovery Act (RCRA)
 Compliance Evaluation Inspection (CEI)

Facility Name:		Plaza Provision - Guaynabo							
EPA ID Number:		PRR000027847							
Completion Date:		June 27, 2023							
Generator Status in Record:		Non-Notifier ¹							
RCRA Permitted:		No							
Corrective Action:		No							
Project ID		CEPD-RCRA-23-0434							
Basis for Inspection:		Core Program (COVID-19 protocols were in place while conducting this CEI) ²							
Facility Personnel:									
Name:		Title:		Email:		Phone:		Attend to:	
								OM ³ FW ⁴ DR ⁵ CM ⁶	
Mr. Oscar Rodriguez		Compliance Supervisor		orodriguez@plazaprovision.com		787-781-2070 x 1286		√ √ √ √	
EPA Personnel:									
Inspector's Name			EPA Region 2-CEPD		Enforcement Officer		phone/email		
Ms. Rosana Caballer-Cruz			EPA Region 2-CEPD		Enforcement Officer		787-977-5880/ caballer.rosana@epa.gov		
Status:		FINAL							
EPA Inspector Signature/Date		X ROSANA CABALLER-CRUZ <small>Digitally signed by ROSANA CABALLER-CRUZ Date: 2023.08.22 18:09:13 -04'00'</small>							
Supervisor Signature/Date		X DAVID CUEVAS MIRANDA <small>Digitally signed by DAVID CUEVAS-MIRANDA Date: 2023.08.23 08:39:13 -04'00'</small> David N. Cuevas Miranda, Ph.D.							

¹ At the time of the inspection, the facility already classified itself as a Large Quantity Generator.

² May 11, 2023, the federal COVID-19 PHE declaration ended.

Reference: <https://www.cdc.gov/coronavirus/2019-ncov/your-health/end-of-phe.html>

³ Opening Meeting

⁴ Facility Walkthrough

⁵ Documents Review. For additional information related to this item, please refer to Sections 3 and 5 of this Report.

⁶ Closing Meeting

1 FACILITY SUMMARY

Facility Physical Location: (Municipality, PR, zip code)	CARR 165 ESQUINA 28, GUAYNABO, PUERTO RICO, 00965.	
Geographical Coordinates:	18.424568, -66.112941	
Facility Information:	PLAZA PROVISION - GUAYNABO	
	787-781-2070	
	Mailing address: PO BOX 363328, SAN JUAN, PUERTO RICO, 00936.	
NAICS:	42441 - GENERAL LINE GROCERY MERCHANT WHOLESALERS ⁷	
Previously inspected:	NO	
Area:	ONE (1) BUILDING	
Employees	APPROXIMATELY 200	
HW ⁸ transferred via pipeline?	NO ⁹	
UST ¹⁰ available at the facility?	NO ¹¹	
NRC ¹² orientation provided?	YES	

2 INTRODUCTION

On June 27, 2023, a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (inspection) was conducted at Plaza Provision - Guaynabo (the facility), pursuant to Section 3007 of RCRA. As part of the inspection, I explained to the facility representative that an opening meeting, walkthrough, and document review, would be conducted to evaluate the facility's compliance with the requirements that govern hazardous waste generators, universal waste handlers, and used oil generators, as applicable.

According to records, the facility has never been inspected by the EPA prior to this inspection, however, it was identified by the Agency as part of the Non-notifiers initiative¹³. I arrived at the facility around 9:40 am. The weather conditions that remained through the CEI were a partially cloudy day with hot temperatures and humidity.

2.1 NON-NOTIFIERS INITIATIVE

This facility was one of the facilities identified as part of the Non-notifiers initiative. Those facilities identified as Non-notifiers, such as Plaza Provision - Guaynabo, are facilities that EPA has a reason to believe that is a generator of hazardous waste, based on EPA's review of eManifests(s). As a generator of hazardous waste, Plaza Provision - Guaynabo, is subject to Sections 3002 and 3010 of RCRA, 42 U.S.C. §§ 6922 and 6930, and the regulations set forth at 40 C.F.R. Parts 262 and/or 270, or the authorized State equivalent. Henceforth, the facility was

⁷ This information was not available at the CEI. It was gathered in RCRA Info.

⁸ Acronym stands for hazardous waste.

⁹ Information provided by the facility representative.

¹⁰ Acronym stands for underground storage tanks.

¹¹ Information provided by the facility representative.

¹² Acronym stands for National Response Center.

¹³ For additional information on this item, please refer to Section 2.1 of this Report.

identified and included to be inspected as soon as the COVID-19 Pandemic health situation allowed us to physically visit it.

2.2 FACILITY PHYSICAL DESCRIPTION AND OPERATION

Plaza Provision - Guaynabo (PP) was established more than 40 years ago and this building encompasses the official location for the company. PP is identified itself as a dry warehouse for household products, such as OTC¹⁴, food, and disinfectants¹⁵, among others. Likewise, Mr. Rodriguez told me that this facility conducts warehouse activities since they store and distribute products from their clients¹⁶. In addition, he told me about the products that could be stored at this facility, such as pesticides¹⁷, batteries¹⁸, food¹⁹, and/or disinfectants. This facility consists of one building²⁰ where they are currently the owners of their lot and the building. Likewise, I was told by the facility representative that approximately 200 employees work from Monday to Friday from 4:00 am to midnight.

2.3 AERIAL PHOTOGRAPH

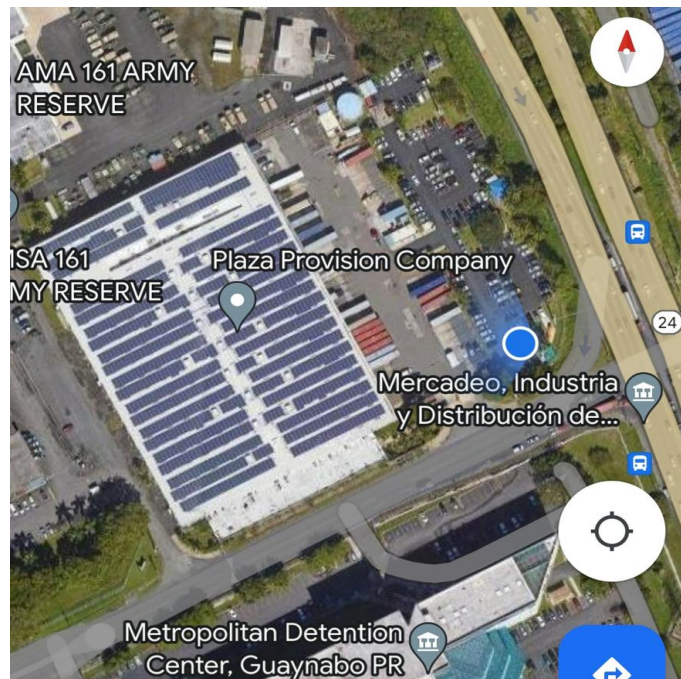


Figure 1: Facility Location - Plaza Provision - Guaynabo

¹⁴ Acronym stands for Over-the-Counter medicines/drugs.

¹⁵ Lysol and Woolite products.

¹⁶ Mr. Rodriguez told me that this facility also conducts donations of food, for human consumption, to the Banco de Alimentos de Puerto Rico. This entity usually came in mid-week in order to pick up the food donations.

¹⁷ Mr. Rodriguez told me that they stored this product for one of their clients and it is intended to be used as a pest control for rats.

¹⁸ For household use, such as Duracell.

¹⁹ In addition to food intended for human consumption (i.e., Ronzoni, Del Monte), Mr. Rodriguez told me that this warehouse also stored food intended to be used in pets (i.e., Champs), such as cats and dogs.

²⁰ As part of the opening meeting, it was told by the facility representative that there is a part of this building that is currently being rented to another company.

2.4 SOLID AND HAZARDOUS WASTE GENERATION

I asked Mr. Rodriguez about the hazardous waste, universal waste, and used oil generation of this facility, in order to know the facility's handling, storing, and/or disposal activities. He told me that they just had one hazardous waste disposal activity since he started at the facility, four (4) years ago. According to him, the disposal occurred on June 7, 2023, and the hauler company was Stericycle. In addition, I asked him about their universal waste and used oil generation, handling, and/or disposal activities. According to him, the facility is not generating universal waste²¹. Related to the used oil, the facility representative told me that the is generated as a result of the facility's equipment maintenance. Safety Kleen is the hauler company that pick-ups the used oil generated at the facility. Information related to any spills and/or chemical releases in his facility was asked, as well. According to him, spills nor chemical releases in their facility have occurred. Finally, I provided the facility representatives with an orientation and information related to NRC, such as but not limited to the phone number.

3 OPENING MEETING

I met at the facility with Mr. Oscar Rodriguez, Compliance Supervisor, for the opening meeting. I identified myself as an EPA RCRA enforcement officer and told the facility representative that the purpose of my visit was to conduct a CEI at the facility to evaluate its hazardous waste, universal waste, and used oil management practices and compliance. In addition, I told him that RCRA, universal wastes, and/or used oil documents would be requested as part of this CEI. As part of the inspection, I told him that I needed to take photos related to any RCRA-related issues. He allowed me to take photos during the inspection. Finally, I also explained that we needed to visit the waste generation areas in the facility.

4 FACILITY WALKTHROUGH

Just after the opening meeting, we started the facility walkthrough. The areas inspected were (i) the Hold Area, (ii) Staging Area, (iii) the Mechanical Shop Area, and (iv) the D-Con Shelf Area. The observations for the areas inspected are described below:

4.1 HOLD AREA

Description of the Area	This was the first area inspected and was observed in the south area of the facility. Located inside the warehouse area, is used to store, until further instructions, the products that would be disposed of, reclaimed, or donated by their clients. Additional information about the latter is as follows.
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This area was already physically segregated by a cyclone fence and a lock was available (Picture

²¹ According to Mr. Rodriguez, they dispose of batteries as hazardous waste. Meanwhile, about the universal waste, and the electronic equipment at the facility, he told me that the facility waits for the annual Colegio de Abogados recycling activity to recycle the latter with them. This activity is every year. For the fluorescent lamps, according to him, when needed, the company which sold them the fluorescent lamps unit, changes the damaged ones for the new ones and pick-us them up.

#1). At the time of the inspection, it was observed open, nevertheless, facilities representatives were inside working within this area²². The area consists of high ceilings²³ and concrete floors. Inside, four (4) metal shelves with products, such as food for human consumption, and household products,²⁴ were observed (Picture #2). According to Mr. Rodriguez, those observed within the metal shelves are the ones that would be donated, reclaimed, or dispose of (Picture #3). I asked Mr. Rodriguez about the communication devices. He replied that this area has available a mainline phone and the supervisor(s) that works within this area are allowed to carry a cell phone.

4.2 STAGING AREA

Description of the Area	This was the second area inspected. Located just at the front of the Hold Area entrance, I observed various open cardboard boxes with damaged products ²⁵ . Additional information is as follows.
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I asked Mr. Rodriguez about these damaged products. According to him, those boxes were placed at this location waiting to be processed to then be placed inside the Holding Area²⁶. At the time of the inspection, all the cardboard boxes were observed above wood panels (Picture #4). I asked him how long these open boxes were placed at this location. He replied that they were placed around 4:00 am²⁷ and would be processed during the same shift²⁸. Mr. Rodriguez told me that the final action related to the observed damaged products would be taken by the owner/client's decision. Nevertheless, he told me that possible scenarios could be donations for a non-profit organization, donations to Plaza Provision company²⁹, and the owner/client of the products could reclaim it or can de dispose of it as regular waste.

4.3 MECHANICAL SHOP AREA

Description of the Area	This was the third area inspected. Aka ³⁰ A-1 Forklift Repairs and Services Area, it is located just at the side of the Hold Area. It was informed by Mr. Rodriguez that this location is handled by their Contractor. Here, Mr. Guadalupe A-1 Company owner, joined us at the inspection. Additional information is as follows.
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²² At the time of the CEI, one (1) supervisor and two (2) staff were working in this area.

²³ According to the facility representative, approximately 20 feet.

²⁴ Not in use.

²⁵ Those were Lysol and Woolite products.

²⁶ For additional information on this item, please refer to Section 4.1 of this Report.

²⁷ Same date of inspection, which was held on June 27, 2023.

²⁸ Same date of inspection, which was held on June 27, 2023.

²⁹ This action is taken if Reddick company approved that action.

³⁰ Acronym stands for also known as.

This area was already physically segregated by a cyclone fence and has a lock available. At the time of the inspection, the area was already open. Nevertheless, two (2) employees were working within this location. Inside, a 55-gallon black steel container was observed above a secondary containment. The latter appears to be in good condition, has a funnel attached to it, the area was labeled as used oil, and observed without any spill or leaks. Nevertheless, the container was not labeled as used oil (Picture #5). Also, three (3) containers were observed in front of this area. In addition, just at the side, an approximately 30-gallon yellow steel container was observed with absorbent material. Finally, I asked about the 55-gallon used oil container disposal activity frequency and the hauler company. Mr. Guadalupe told me that this container is picked up by Safety Kleen and is picked up once per year.

Likewise, one part washer equipment was observed. I asked Mr. Guadalupe about the latter. He told me that this unit is currently in use and the hauler company which provides hauler services for this equipment is Safety Kleen. I asked him how frequent the disposal activity is, and he replied that the part washer disposal occurs approximately every two (2) months. At the time of the CEI, the part washer was labeled, and dry, but was observed open (Picture #6).

I told the facility representatives the following:

Used oil Label – I told them that, at the time of the inspection, the 55-gallon black steel container observed in this area was not labeled as used oil, as required by the RCRA Regulation.

4.4 D-CON SHELF AREA

Description of the Area	This was the last area inspected. Located in the northwest area of the facility, it is consisting of a metal shelfe cage-like area with a fence, lock and measures approximately 25 feet long. Additional information is as follows.
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At the time of the inspection, this cage-like area was observed open (Picture #7). Mr. Rodriguez told me that it was observed open since facility representatives are currently working on dispatching products stored in this area. Although it was observed open, Mr. Rodriguez told me that this cage-like area must be closed by the end of every shift. At the time of the inspection, products were observed within this area.

5 DOCUMENTS

5.1 DOCUMENT REQUEST

I explained to the facility representative that, as part of the CEI activities, an evaluation of documents would be conducted. I asked him for the following documents for review: (1) job description, (2) training records, (3) contingency plan, and (4) manifests. The information requested was provided, via email, at a later date³¹. Information related to each document is

³¹ The information was provided by Mr. Rodriguez on July 28, 2023.

presented below:

Documents Requested	Requested during CEI	Available during CEI?	Description
1. Job Description	YES	YES	The information was not available for review at the facility. Nevertheless, it was provided, via email, at a later date.
2. Training Records	YES	NO	At the time of the inspection, documents related to this item were not available for review.
3. Contingency Plan	YES	YES	The information was not available for review at the facility. Nevertheless, it was provided, via email, at a later date.
4. Manifests	YES	YES	The information was not available for review at the facility. Nevertheless, it was provided, via email, at a later date.

5.2 DOCUMENTS REVIEW

5.2.1 JOB DESCRIPTIONS

One (1) document was provided for evaluation. Additional information is as follows: The name of the document is Compliance & Facilities Supervisor, Handyman. Information related to the effective date of this document is not available. Although the document included the following statement: “Supports building security systems and emergency preparation plans for fire evacuations and possible disaster response”, additional information about hazardous waste management and/or training in RCRA or hazardous waste items was not included.

5.2.2 TRAINING RECORDS

I asked Mr. Rodriguez about the training records. He told me this information is not available since, at the time of the inspection, RCRA or hazardous waste training has not been provided. Nevertheless, he told me that he took note of this issue and that he will contact the corresponding facility’s personnel in order to address this observation. Likewise, additional information related to this item was requested as part of the closing meeting and via email, which was sent to Mr. Rodriguez on June 27, 2023. On June 28, 2028, Mr. Rodriguez provided information about this issue and notified me that he enrolled to participate in the 40 hrs HAZWOPER Training, which will be held from September 11, 2023, to September 15, 2023, respectively. Finally, he notified me that as soon as he receives the training certificate, he will provide it to us.

5.2.3 CONTINGENCY PLAN

One (1) 33 pages document, identified as “Plan de Emergencia y Continuidad de Negocio”

(Plan) was provided for evaluation, but information about whom signed the latter and when this document was generated nor last reviewed is not available. The document evaluated includes the emergency response team names, nevertheless, the emergency response team contact numbers were not included in the document. Likewise, the document includes the evacuation map and routes, the location of facility emergency equipment (i.e., fire extinguishers), and the external emergency response/agency contact numbers. Although this information was included in their Plan, the document lacks various RCRA Regulation requirements, such as the complete emergency equipment list with a physical description and capabilities, the arrangements with local authorities, first responders' letter evidence that the facility provided their contingency plan to the local authorities and/or first responders, the quick reference guide, and the names and emergency telephone numbers of all persons qualified to act as emergency coordinator³².

5.2.6 MANIFESTS

The information provided by the facility representatives was one (1) non-hazardous waste manifest, identified as 20194, with the date 06/13/2023. According to this document, the hauler company, Stericycle, picked up to 12 yards of alkaline batteries (AAA), that according to the waste stream document provided, were not EPA Hazardous. Finally, it was received at the final destination on 06/27/2023³³.

6 CLOSING MEETING

On June 27, 2023, the closing meeting was conducted with the facility representative, at the facility. I indicated that the purpose of the closing meeting was to inform him about the CEI observations raised. As part of the closing meeting, I told the facility representatives that additional information would be sent for their reference and that additional information would be requested³⁴. The latter was sent, as agreed, on June 27, 2023. For more information, please refer to Section 8 and Section 9 of this Report.

7 POTENTIAL AREAS OF CONCERN

7.1 GENERATORS

On March 16, 2022, the facility notified of its hazardous waste activities as a Large Quantity Generator³⁵. Based on the observations and information gathered during the inspection, the following areas of concern were identified:

7.1.1 SUBPART A - STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE GENERAL

i. According to 40 CFR 262.17(a)(7)(i)(A), which states that *“Facility personnel must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job training that teaches them to perform their duties in a way that*

³² As required by Regulation, this list must be kept up to date.

³³ This date was hard to read, and it can be subject to change.

³⁴ The due date for the latter was June 30, 2023.

³⁵ According to RCRA Info.

ensures compliance with this part. The large quantity generator must ensure that this program includes all the elements described in the document required under paragraph (a)(7)(iv) of this section.”

At the time of the inspection, the facility failed to comply with this requirement since the facility personnel has not completed a program or training related to hazardous waste management.

ii. According to 40 CFR 262.17(a)(7)(iv)(B), which states that *“A written job description for each position listed under paragraph (a)(7)(iv)(A) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.”*

At the time of the inspection, the facility failed to comply with this requirement. Although the facility representative has available for evaluation the Compliance & Facilities Supervisor, Handyman job description, which includes the following statement: *“Supports building security systems and emergency preparation plans for fire evacuations and possible disaster response”*, information about hazardous waste management and/or training in RCRA or hazardous waste provisions were not included.

7.1.2 SUBPART M—PREPAREDNESS, PREVENTION, AND EMERGENCY PROCEDURES FOR LARGE QUANTITY GENERATORS

iii. According to 40 CFR 262.261(b), which states that *“if the generator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with part 112 of this chapter, or some other emergency or contingency plan, it need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the standards of this part. The generator may develop one contingency plan that meets all regulatory standards. EPA recommends that the plan be based on the National Response Team's Integrated Contingency Plan Guidance (“One Plan”).”*

At the time of the inspection, the facility failed to comply with this requirement. Although the facility has a document identified as “Plan de Emergencia y Continuidad de Negocio” which, indeed, included some information such as the emergency response team names, the evacuation map, and routes, the location of facility emergency equipment (i.e., fire extinguishers), and the external emergency response/agency contact numbers, this document did not incorporate sufficient hazardous waste management provisions to comply with the standards of this part. Hence, the document evaluated did not meet all regulatory standards required by the Regulation.

iv. According to 40 CFR 262.261(c), which states that *“The plan must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee, pursuant to § 262.256.”*

At the time of the inspection, the facility failed to comply with this requirement since the information requested in the citation above was not found in the document provided and evaluated.

v. According to 40 CFR 262.261(d), which states that *“The plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see § 262.264), and this list must be kept up to date...”*

At the time of the inspection, the facility failed to comply with this requirement. During the documents review section, the facility’s emergency response phone numbers were not available at the document evaluated.

vi. According to 40 CFR 262.261(e), which states that *“The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.”*

At the time of the inspection, the facility failed to comply with this requirement. Although the document provided for evaluation includes the map with the location of the facility’s fire extinguishers, the physical description of the item and a brief outline of its capabilities were not found in the document. Likewise, information related to additional facility emergency equipment; with its corresponding location, physical description, and a brief outline of its capabilities was also not found in the document evaluated.

vii. According to 40 CFR 262.262(a), which states that *“The large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the Local Emergency Planning Committee, as appropriate.”*

At the time of the inspection, the facility failed to comply with this requirement since evidence that the facility has submitted a copy of the contingency plan to all local emergency responders was not found as part of the evaluation of the document.

viii. According to 40 CFR 262.262(b), which states that *“A large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee...”*

At the time of the inspection, the facility failed to comply with this requirement since a quick reference guide was not found as part of the evaluation of the document.

7.1.3. PART 279—STANDARDS FOR THE MANAGEMENT OF USED OIL

ix. According to 40 CFR 279.22(c)(1), which states that *Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”*

At the time of the inspection, the facility failed to comply with this requirement in the Mechanical Shop Area. At this area, aka the A-1 Forklift Repairs and Services Area, a 55-gallon black steel container was not labeled as used oil.

8 FOLLOW-UP ACTIONS

As expressed in Section 6 of this Report, an email to the facility representative was sent on June 27, 2023. The email included direct links which provide information related to the RCRA Regulation (40 CFR §§ 260 to 265), Universal Waste (40 CFR § 273), and Used Oil (40 CFR § 279), among other direct links with specifics, such as aerosol cans, satellites accumulation areas (SAAs), aisle space, etc. In addition, the EPA Form 8700-12, and one page with additional links which provide direct links for specific items for the RCRA Regulation were sent for their future reference.

8.1 REQUESTS

Information Requested	Reason
1. <i>Documents: Job description, Contingency Plan, Manifest, and Training information</i>	- This information was requested in order to comply with the regulation requirements.

8.2 INFORMATION PROVIDED TO THE FACILITY REPRESENTATIVE

Information Requested	Link	Enclosed
1. <i>RCRA (Hazardous Waste)</i>	√	
2. <i>Summary of Requirements for Very Small Quantity Generators (VSQGs)</i>	√	
3. <i>Summary of Requirements for Small Quantity Generators (SQGs)</i>	√	
4. <i>Summary of Requirements for Large Quantity Generators (LQGs)</i>	√	
5. <i>Universal Waste</i>	√	
6. <i>Used Oil</i>	√	
7. <i>Aerosol cans</i>	√	
8. <i>Satellite Accumulation Areas</i>	√	
9. <i>Condition of containers</i>	√	
10. <i>Aisle space</i>	√	
11. <i>Alternative Standards for Episodic Generation</i>	√	
12. <i>National Response Center</i>	√	
13. <i>Hazardous Waste Generator Regulations Compendium</i>	√	
14. <i>Defining Hazardous Waste</i>	√	
15. <i>P-waste</i>	√	
16. <i>EPA Form 8700-12</i>	√	√

<i>17. One page with additional links which provide direct links for specific items for the RCRA Regulation</i>	√	√
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9 ATTACHMENTS

I. CAMERA ROLL

II. APPENDIX 1: SITE PICTURES

III. OTHER: EMAIL SENT TO FACILITY REPRESENTATIVE ON JUNE 27, 2023.

ATTACHMENT I: CAMERA ROLL

« In response of COVID19 > FY'23 > CEIs > Plaza Provision-Guaynabo > Pictures



Search Pictures



✔ DSCN1662.JPG



✔ DSCN1663.JPG



✔ DSCN1664.JPG



✔ DSCN1665.JPG



✔ DSCN1666.JPG



✔ DSCN1667.JPG



✔ DSCN1668.JPG



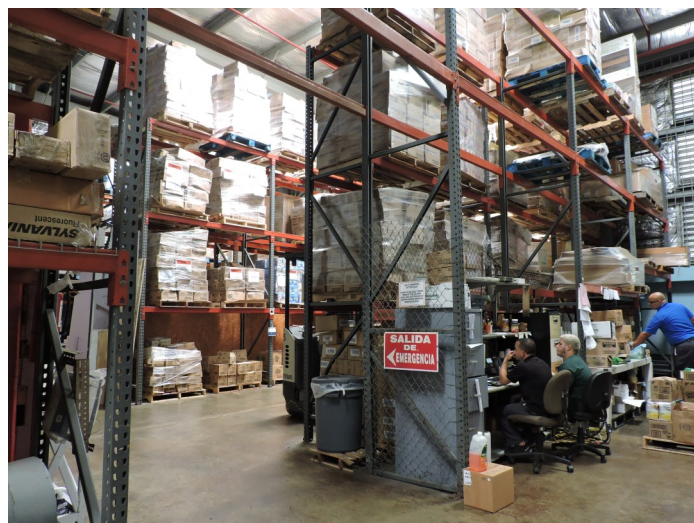
✔ DSCN1669.JPG



✔ DSCN1670.JPG



Picture 1 — Hold Area— Located inside the warehouse area, is used to store the products that would be disposed of, reclaimed, or donated by their clients. It was already physically segregated by a cyclone fence and a lock was available



Picture 2 — Hold Area— Inside this area, four (4) metal shelves with products, such as food for human consumption, and household products, were observed



Picture 3 — Hold Area— Zoom-in picture of two (2) of the available pallets with products observed in this area.



Picture 4 — Staging Area— This area was located just at the front of the Hold Area entrance. At the time of the inspection, all the cardboard boxes have damaged products and were observed above wood panels.



Title:
Appendix 1—Facility Pictures
EPA ID:
PRR000027847

Facility:
Plaza Provision - Guaynabo
Project:
CEPD-RCRA-23-0434

Pictures taken by:
R. Caballer-Cruz
Date:
2023-06-27



Picture 5— Mechanical Shop Area—Here, a 55-gallon black steel container was observed above a secondary containment. At the time of the inspection, the container was not labeled as used oil.



Picture 6— Mechanical Shop Area— At the time of the inspection, a part washer was observed labeled, and dry, but it was open.



Picture 7— D-CON Shelf Area—This area was located in the northwest area of the facility. It is consisting of a metal shelve cage-like area with a fence, lock and measure approximately 25 feet long.



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