

## EPA REGION 10 Enforcement Division

### INSPECTION REPORT

|                                   |                                                                                                                                                                                 |                                                                             |                |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|----------------|
| Inspection Entry Date/Time        | 07/11/2024 09:27 AM (AKT)                                                                                                                                                       | Announced: No                                                               |                |
| Inspection Exit Date/Time         | 07/11/2024 11:16 AM (AKT)                                                                                                                                                       | Access: Granted                                                             |                |
| Regulatory Program                | Resource Conservation and Recovery Act (RCRA)                                                                                                                                   |                                                                             |                |
| Type of Inspection                | Compliance Evaluation Inspection (CEI)                                                                                                                                          |                                                                             |                |
|                                   |                                                                                                                                                                                 |                                                                             |                |
| Company Name                      | Staples                                                                                                                                                                         |                                                                             |                |
| Facility or Site Name             | Staples                                                                                                                                                                         |                                                                             |                |
| Facility/Site Identifier          | AKD983073792                                                                                                                                                                    |                                                                             |                |
| Facility/Site Physical Address    | 4831 Old Seward Hwy                                                                                                                                                             |                                                                             |                |
| City, State, Zip Code             | Anchorage, AK 99503                                                                                                                                                             |                                                                             |                |
| County/Borough                    | Anchorage Municipality                                                                                                                                                          |                                                                             |                |
| Generator Status                  | Small Quantity Generator (SQG)                                                                                                                                                  |                                                                             |                |
| NAICS                             | 493110 - GENERAL WAREHOUSING AND STORAGE                                                                                                                                        |                                                                             |                |
| Type of Operation                 | Office supply warehouse/distributor                                                                                                                                             |                                                                             |                |
| Geographic Coordinates            | 61.17644, -149.86816                                                                                                                                                            |                                                                             |                |
| Mailing Address/Secondary Address | Richard Benedetto, Fulfillment Center Manager<br>4831 Old Seward Hwy<br>Anchorage, AK 99503<br><a href="mailto:Richard.Benedetto@staples.com">Richard.Benedetto@staples.com</a> |                                                                             |                |
| City, State, Zip Code             | Anchorage, AK 99503                                                                                                                                                             |                                                                             |                |
|                                   |                                                                                                                                                                                 |                                                                             |                |
| Permit Number (If Applicable)     | Not Applicable                                                                                                                                                                  |                                                                             |                |
|                                   |                                                                                                                                                                                 |                                                                             |                |
| Lead Inspector:                   |                                                                                                                                                                                 |                                                                             |                |
| Jon Jones                         | Jones, Jon                                                                                                                                                                      | Digitally signed by Jones, Jon<br>Date: 2024.11.04 12:23:22 -09'00'         |                |
|                                   | EPA REGION 10                                                                                                                                                                   | Jones.Jon@epa.gov                                                           | (907) 227-4316 |
|                                   |                                                                                                                                                                                 |                                                                             |                |
| Supervisor Review:                |                                                                                                                                                                                 |                                                                             |                |
| Matthew Quarterman                | MATTHEW QUARTERMAN                                                                                                                                                              | Digitally signed by MATTHEW QUARTERMAN<br>Date: 2024.11.15 14:54:14 -08'00' |                |
|                                   | EPA REGION 10                                                                                                                                                                   | Quarterman.Matthew@epa.gov                                                  | (206) 553-2146 |

## SECTION I – INTRODUCTION

### Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector Jon Jones arrived at the Staples Facility (the “Site” or “Facility”), located at 4831 Old Seward Hwy, Anchorage, AK 99503, at 09:27 AM (AKT) on 07/11/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Kevin Knight that this was an EPA REGION 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273) and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for FY 2024.

This report is based on information supplied by Staples Facility representatives, observations made by the EPA Region 10 inspector, 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 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 subsequent to 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         | (907) 271-6329 | Jones.Jon@epa.gov             | Yes           | Yes           |
| RCRA Inspector/Enforcement Officer/EPA | Xiangyu Chu       |                | Chu.Xiangyu@epa.gov           | Yes           | Yes           |
| ADEC/Inspector in Training             | Grace Tapulgo     | (907) 269-7578 | Grace.Tapulgo@alaska.gov      | Yes           | Yes           |
| Fulfillment Center Manager /Staples    | Richard Benedetto | (907) 982-8708 | Richard.Benedetto@staples.com | No            | Yes           |
| Operations Supervisor /Staples         | Kevin Knight      | (907) 306-6299 | Kevin.Knight@staples.com      | Yes           | Yes           |

#### Opening Conference

Jon Jones, along with EPA Region 10 Inspector Xiangyu Chu, and Alaska Department of Environmental Conservation (ADEC) Inspector Grace Tapulgo, arrived at the facility at 9:27 am and met with Operations Supervisor, Kevin Knight, for the opening conference.

We presented our inspector credentials, provided business cards, and informed Knight that this was a routine hazardous waste compliance inspection in accordance with RCRA. We explained that the ADEC inspector was accompanying the inspection for training purposes.

During the opening conference, we explained that the focus of the RCRA inspection was to identify and observe types of waste generated, points of waste generation, methods of waste management, and review related documents. These documents included manifests, hazardous waste training, and weekly inspections from the last three years.

Only areas of potential compliance concerns or other issues are recorded in this inspection report.

#### Facility/Site Information

|                                |                                                   |
|--------------------------------|---------------------------------------------------|
| Number of employees            | 15                                                |
| Length of Facility at Location | 24+ years                                         |
| Operating Hours                | Monday through Friday from 6:30 a.m. to 8:30 p.m. |

|                                                     |                                |
|-----------------------------------------------------|--------------------------------|
| <b>Safety Training Provided to Inspector(s)?</b>    | No                             |
| <b>Size of Facility</b>                             | Approximately 20K square feet  |
| <b>What type of generator facility notified?</b>    | Small Quantity Generator (SQG) |
| <b>What type of generator facility verified as?</b> | SQG                            |

### Process Description

During the opening conference Mr. Knight explained that there is no storefront, and the facility is not open to the public. All goods are shipped directly to the customers. Additionally, Mr. Knight informed us that they recycle batteries and that the hazardous waste generated by Staples is either due to receiving damaged products from their supplier, or materials that have expired. The hazardous waste produced typically includes aerosols, paint, flammables in the form of ethyl alcohol and petroleum distillates, and corrosive wastes. They store hazardous waste in three locations: "Across from Roll-Up Door 8", the central accumulation area (CAA), and the "Northeast Corner".

Mr. Knight accompanied us through the inspection, gave us permission to take photographs, and did not deny us access to any part of the facility. During the inspection we examined the facility's processes, hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representative had not yet identified or designated as hazardous. We also observed the facility's universal waste management. Specifically, we inspected the areas of the facility listed below.

We inspected the areas of the facility listed in the building(s) table below.

### Building(s)

| Building/Area/Sub-area     | Process Description                                                                                | Area of Concern |
|----------------------------|----------------------------------------------------------------------------------------------------|-----------------|
| <b>Staples</b>             |                                                                                                    | Yes             |
| Across from roll-up door 8 | Pallet with cans of paint – awaiting waste determination.                                          | Yes             |
| CAA                        | Universal Waste is stored here, also a box of waste paint.                                         | Yes             |
| Northeast corner           | Damaged and expired items are stored on pallets until they are picked up quarterly by Clean Earth. | Yes             |

### SECTION II – OBSERVATIONS

|                                                                                                                                                                                                                                                                                                                                                                           |                         |                                     |                         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------|-------------------------|
| <b>Building:</b> Staples/CAA                                                                                                                                                                                                                                                                                                                                              |                         |                                     |                         |
| <b>Observation #:</b> JJ1-OB-001                                                                                                                                                                                                                                                                                                                                          | <b>Date:</b> 07/11/2024 | <b>Contains AOC:</b> Yes            | <b>Contains CBI:</b> No |
| <b>Person Interviewed:</b> Kevin Knight                                                                                                                                                                                                                                                                                                                                   |                         | <b>Title:</b> Operations Supervisor |                         |
| Mr. Knight led us over to where universal waste and hazardous waste is stored. We observed a cardboard box on the ground that contained waste paint cans. Two of the cans of waste paint were determined to be hazardous waste due to their ignitability, but were not labeled with a hazard indicator, an accumulation start date (ASD), or the words “Hazardous Waste.” |                         |                                     |                         |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                         |                                     |                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------|-------------------------|
| <b>Building:</b> Staples/Northeast corner                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                         |                                     |                         |
| <b>Observation #:</b> JJ1-OB-002                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Date:</b> 07/11/2024 | <b>Contains AOC:</b> Yes            | <b>Contains CBI:</b> No |
| <b>Person Interviewed:</b> Kevin Knight                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                         | <b>Title:</b> Operations Supervisor |                         |
| <p>Mr. Knight led us over to the Northeast Corner where there were multiple pallets of waste items. We observed two pallets of hand soap that we were informed were non-hazardous. We also saw one pallet of hand sanitizer, a D001 hazardous waste with a flash point between 60-70 degrees Fahrenheit, that was missing a hazard indicator and a hazardous waste label. Mr. Knight informed us that it had been generated about 2 months prior. Additionally, we observed a pallet that contained hand sanitizing alcohol wipes. This pallet had a hazard indicator but was missing a proper label with the words "hazardous waste". This pallet also had a label indicating that it weighed 1,386 pounds and that it had been on site since 10/01/23, greater than 270 days.</p> |                         |                                     |                         |

|                                                                                                                                                                                                                                                                                                                       |                         |                                     |                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------|-------------------------|
| <b>Building:</b> Staples/Across from roll-up door 8                                                                                                                                                                                                                                                                   |                         |                                     |                         |
| <b>Observation #:</b> JJ1-OB-003                                                                                                                                                                                                                                                                                      | <b>Date:</b> 07/11/2024 | <b>Contains AOC:</b> No             | <b>Contains CBI:</b> No |
| <b>Person Interviewed:</b> Kevin Knight                                                                                                                                                                                                                                                                               |                         | <b>Title:</b> Operations Supervisor |                         |
| <p>We observed a pallet with paint cans on it, all of which appear to be latex. Mr. Knight could not identify if the paints were waste.</p> <p>In an email received from Mr. Knight on 07/16/2024, he informed us that the paints we observed were not waste as they were still being used to paint the facility.</p> |                         |                                     |                         |

### SECTION III – RECORDS REVIEW

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                               |                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------------------------------|
| <b>Record:</b> Manifests                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                               | <b>AOC:</b> Yes                  |
| <b>Ref #:</b> JJ1-RR-001                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Reviewed By:</b> Jon Jones | <b>Reviewed Date:</b> 07/11/2024 |
| <p>When looking through manifests, we observed manifest 200798337CLE from May 10, 2024, that was missing a signature from the destination facility and was past 60 days without an exception report. Additionally, we found manifest 200229445CLE from 08/18/22, that was missing a signature from the destination facility and was past 60 days without an exception report.</p> <p>Richard Benedetto, Fulfillment Center Manager, later sent us copies of the signed manifests on 07/16/24, and they were not over 60 days.</p> |                               |                                  |
| <b>Record:</b> Inspections                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                               | <b>AOC:</b> Yes                  |
| <b>Ref #:</b> JJ1-RR-002                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Reviewed By:</b> Jon Jones | <b>Reviewed Date:</b> 07/16/2024 |
| <p>At the time of the inspection, we requested that Richard Benedetto send us the last three years of weekly inspection logs.</p> <p>Benedetto sent over the documents on 07/16/24. 17 weeks from 2021 were not provided. Upon review, we observed a total of 18 weeks of inspections missing from 2021, 2 weeks missing from 2022, 10 weeks missing from 2023, and 8 weeks missing from 2024. Additionally, one inspection date 10/22/22 was on a Saturday, outside of the operating hours provided by Knight.</p>               |                               |                                  |

### SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

|                                                                                                                                                                                                                                                                                                     |                                         |                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|------------------|
| <b>Building:</b> Staples                                                                                                                                                                                                                                                                            | <b>Area:</b> CAA                        | <b>Sub-area:</b> |
| <b>JJ1-OB-001</b>                                                                                                                                                                                                                                                                                   |                                         |                  |
| Two, 1-gallon cans of waste paint were not labeled with a hazard indicator, an ASD, or the words "Hazardous Waste."                                                                                                                                                                                 | <b>Regulation:</b>                      | <b>Sections:</b> |
| <b>Building:</b> Staples                                                                                                                                                                                                                                                                            | <b>Area:</b> Northeast corner           | <b>Sub-area:</b> |
| <b>JJ1-OB-002</b>                                                                                                                                                                                                                                                                                   |                                         |                  |
| One pallet of waste hand sanitizer was not labeled with the words "Hazardous Waste" or marked with a hazard indicator.                                                                                                                                                                              | <b>Regulation:</b>                      | <b>Sections:</b> |
| <b>Building:</b> Staples                                                                                                                                                                                                                                                                            | <b>Area:</b> Northeast corner           | <b>Sub-area:</b> |
| <b>JJ1-OB-002</b>                                                                                                                                                                                                                                                                                   |                                         |                  |
| One pallet containing waste hand sanitizing alcohol wipes was not labeled with the words "Hazardous Waste."<br><br>The pallet of waste hand sanitizing alcohol wipes had an ASD of 10/01/23 and had been accumulated onsite for greater than 270 days.                                              | <b>Regulation:</b>                      | <b>Sections:</b> |
| <b>Building:</b> Staples                                                                                                                                                                                                                                                                            | <b>Area:</b> Across from roll-up door 8 | <b>Sub-area:</b> |
| <b>JJ1-OB-003</b>                                                                                                                                                                                                                                                                                   |                                         |                  |
| A pallet with paint cans on it, unknown to employees if they were waste. Failure to make a hazardous waste determination.<br><br>In an email received from Mr. Knight on 07/16/2024, he informed us that the paints we observed were not waste as they were still being used to paint the facility. | <b>Regulation:</b>                      | <b>Sections:</b> |

**Record:** Manifests

**JJ1-RR-001**

|                                                                                                                                                                                                                                                                                                                                               |                    |                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|------------------|
| <p>Manifest 200798337CLE from 5/10/24, missing a signature from the destination facility, past the 60 days permitted. Signed manifest was sent to us 07/16/24.</p> <p>Manifest 200229445CLE from 08/18/24, missing a signature from the destination facility and was past the 60 days permitted. Signed manifest was sent to us 07/16/24.</p> | <b>Regulation:</b> | <b>Sections:</b> |
| <b>Record: Inspections</b>                                                                                                                                                                                                                                                                                                                    |                    |                  |
| <b>JJ1-RR-002</b>                                                                                                                                                                                                                                                                                                                             |                    |                  |
| <p>18 weeks of missing inspections from 2021, 2 weeks missing from 2022, 10 weeks missing from 23, and 8 weeks missing from 2024.</p>                                                                                                                                                                                                         | <b>Regulation:</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 Staples Staff 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 we observed during my inspection of the facility.

We requested the past three years of weekly inspections, a copy of the inspection checklist, the signed copies of the two manifests that were missing signatures, and the training certificates of the employees who handle the hazardous waste on site. Additionally, Mr. Knight stated that he would fix the labeling issues of the pallets and paint boxes and send us pictures of the corrections. Mr. Knight also stated that he would make a waste determination on the paints located “Across from Door 8”.

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 documented violations.

### Follow Up

On 7/17/2024, Mr. Benedetto sent me an email containing the past three years of weekly inspections, a copy of the inspection checklist, the signed copies of the two manifests that were missing signatures, and the training certificates of the employees who handle the hazardous waste on site. Additionally, photos of the corrected labeling of the pallets and box of paint cans were sent to us in a separate email, and they informed us that the paint cans located “Across from Door 8” were not waste.

**SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS**

**No sampling was conducted.**

**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

## APPENDIX 1: PHOTO LOG



|                                                       |        |        |                             |
|-------------------------------------------------------|--------|--------|-----------------------------|
| Two cans of hazardous waste paint at CAA              |        |        | 07-11-2024 Staples 003.jpg  |
| 07/11/2024 09:51 AM                                   | No CBI | No PII | Photographer: Grace Tapulgo |
| CAA                                                   |        |        | [Geographic Coordinates]    |
| Two cans of hazardous waste paint located at the CAA. |        |        |                             |



|                                                                       |        |        |                             |
|-----------------------------------------------------------------------|--------|--------|-----------------------------|
| Two cans of hazardous waste paint at CAA                              |        |        | 07-11-2024 Staples 004.jpg  |
| 07/11/2024 09:51 AM                                                   | No CBI | No PII | Photographer: Grace Tapulgo |
| CAA                                                                   |        |        | [Geographic Coordinates]    |
| The back of the two cans of hazardous waste paint located at the CAA. |        |        |                             |



|                                                                                  |        |        |                             |
|----------------------------------------------------------------------------------|--------|--------|-----------------------------|
| Box of paints unlabeled                                                          |        |        | 07-11-2024 Staples 005.jpg  |
| 07/11/2024 09:51 AM                                                              | No CBI | No PII | Photographer: Grace Tapulgo |
| CAA                                                                              |        |        | [Geographic Coordinates]    |
| Box of waste paint containing two hazardous waste paint cans located at the CAA. |        |        |                             |



|                               |        |        |                             |
|-------------------------------|--------|--------|-----------------------------|
| CAA                           |        |        | 07-11-2024 Staples 006.jpg  |
| 07/11/2024 09:52 AM           | No CBI | No PII | Photographer: Grace Tapulgo |
| CAA                           |        |        | [Geographic Coordinates]    |
| Establishing shot of the CAA. |        |        |                             |



|                                      |        |        |                             |
|--------------------------------------|--------|--------|-----------------------------|
| Pallet of Hazardous Waste            |        |        | 07-11-2024 Staples 007.jpg  |
| 07/11/2024 09:56 AM                  | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                     |        |        | [Geographic Coordinates]    |
| Pallet of hazardous waste unlabeled. |        |        |                             |



|                                                                   |        |        |                             |
|-------------------------------------------------------------------|--------|--------|-----------------------------|
| Close up of Waste Product                                         |        |        | 07-11-2024 Staples 008.jpg  |
| 07/11/2024 09:57 AM                                               | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                                                  |        |        | [Geographic Coordinates]    |
| Close up of waste product on unlabeled pallet of hazardous waste. |        |        |                             |



|                                                             |        |        |                             |
|-------------------------------------------------------------|--------|--------|-----------------------------|
| Close up of Waste Hand Sanitizer                            |        |        | 07-11-2024 Staples 009.jpg  |
| 07/11/2024 09:57 AM                                         | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                                            |        |        | [Geographic Coordinates]    |
| Close up of waste hand sanitizer on hazardous waste pallet. |        |        |                             |



|                                               |        |        |                             |
|-----------------------------------------------|--------|--------|-----------------------------|
| Close Up of Waste Floor Finish                |        |        | 07-11-2024 Staples 010.jpg  |
| 07/11/2024 09:57 AM                           | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                              |        |        | [Geographic Coordinates]    |
| Waste floor finish on hazardous waste pallet. |        |        |                             |



|                                                                                                                                  |        |        |                             |
|----------------------------------------------------------------------------------------------------------------------------------|--------|--------|-----------------------------|
| Hazardous Waste Pallet                                                                                                           |        |        | 07-11-2024 Staples 011.jpg  |
| 07/11/2024 09:59 AM                                                                                                              | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                                                                                                                 |        |        | [Geographic Coordinates]    |
| Hazardous Waste Pallet of hand sanitizing wipes marked flammable, missing Hazardous Waste label, and dated from October of 2023. |        |        |                             |



|                                                                                                      |        |        |                             |
|------------------------------------------------------------------------------------------------------|--------|--------|-----------------------------|
| Accumulation Date Label                                                                              |        |        | 07-11-2024 Staples 012.jpg  |
| 07/11/2024 09:59 AM                                                                                  | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                                                                                     |        |        | [Geographic Coordinates]    |
| Label with date of accumulation on hazardous waste pallet. Dated from 10/01/2023, over the 270 days. |        |        |                             |



|                                                                                                                       |        |        |                             |
|-----------------------------------------------------------------------------------------------------------------------|--------|--------|-----------------------------|
| Pallet of corrosive wastes                                                                                            |        |        | 07-11-2024 Staples 016.jpg  |
| 07/11/2024 10:02 AM                                                                                                   | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                                                                                                      |        |        | [Geographic Coordinates]    |
| Pallet of hazardous waste corrosives on a pallet. Damaged box of corrosives only partially contained in plastic wrap. |        |        |                             |



|                                                  |        |        |                             |
|--------------------------------------------------|--------|--------|-----------------------------|
| Floor Stripper                                   |        |        | 07-11-2024 Staples 017.jpg  |
| 07/11/2024 10:03 AM                              | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                                 |        |        | [Geographic Coordinates]    |
| Bucket of floor stripper from corrosives pallet. |        |        |                             |



|                                                |        |        |                             |
|------------------------------------------------|--------|--------|-----------------------------|
| Corrosive markers on boxes                     |        |        | 07-11-2024 Staples 018.jpg  |
| 07/11/2024 10:03 AM                            | No CBI | No PII | Photographer: Grace Tapulgo |
| Northeast Corner                               |        |        | [Geographic Coordinates]    |
| Close up of boxes marked corrosives on pallet. |        |        |                             |



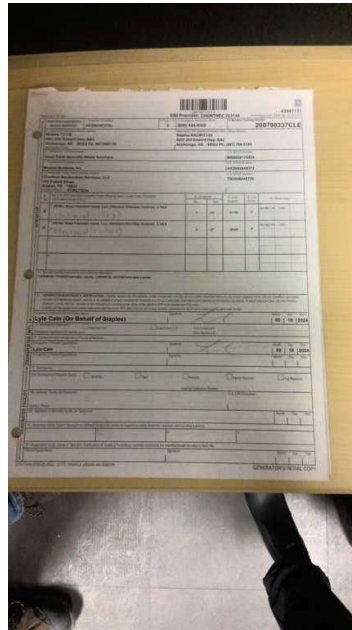
|                                                                                       |        |        |                             |
|---------------------------------------------------------------------------------------|--------|--------|-----------------------------|
| Pallet Across from Door 8                                                             |        |        | 07-11-2024 Staples 022.jpg  |
| 07/11/2024 10:31 AM                                                                   | No CBI | No PII | Photographer: Grace Tapulgo |
| Across from Door 8                                                                    |        |        | [Geographic Coordinates]    |
| Pallet where paint cans were found that Knight could not identify as in-use or waste. |        |        |                             |



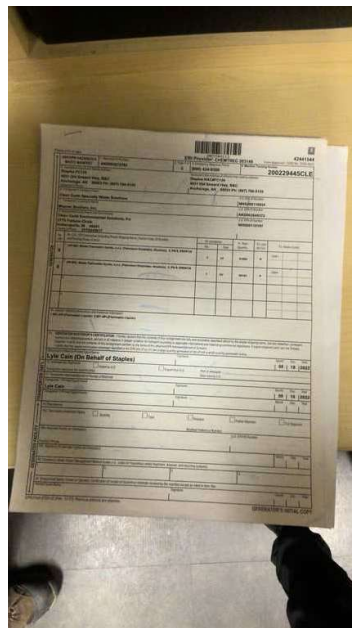
|                                                                                                      |        |        |                             |
|------------------------------------------------------------------------------------------------------|--------|--------|-----------------------------|
| Paint cans from "Across from Door 8"                                                                 |        |        | 07-11-2024 Staples 023.jpg  |
| 07/11/2024 10:31 AM                                                                                  | No CBI | No PII | Photographer: Grace Tapulgo |
| Across from Door 8                                                                                   |        |        | [Geographic Coordinates]    |
| Cans of paint from the pallet that was "Across from Door 8". Unidentified as either waste or in-use. |        |        |                             |



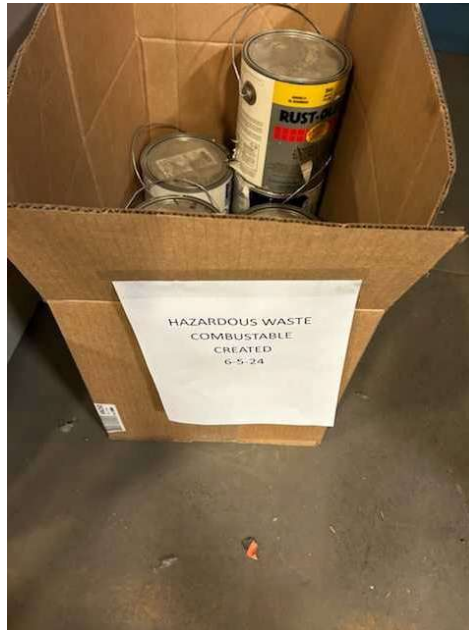
|                                                                                                                               |        |        |                             |
|-------------------------------------------------------------------------------------------------------------------------------|--------|--------|-----------------------------|
| [Title]                                                                                                                       |        |        | 07-11-2024 Staples 025.jpg  |
| 07/11/2024 10:31 AM                                                                                                           | No CBI | No PII | Photographer: Grace Tapulgo |
| Across from Door 8                                                                                                            |        |        | [Geographic Coordinates]    |
| Close-up view of one of the paint cans from the pallet that was "Across from Door 8". Unidentified as either waste or in-use. |        |        |                             |



|                                                                                    |        |        |                             |
|------------------------------------------------------------------------------------|--------|--------|-----------------------------|
| Manifest 200798337CLE                                                              |        |        | 07-11-2024 Staples 001.jpg  |
| 07/11/2024 10:51 AM                                                                | No CBI | No PII | Photographer: Grace Tapulgo |
| [Building/Area]                                                                    |        |        | [Geographic Coordinates]    |
| Manifest 200798337CLE from 05/10/2024 missing signature from destination facility. |        |        |                             |



|                                                                                    |        |        |                             |
|------------------------------------------------------------------------------------|--------|--------|-----------------------------|
| Manifest 200229445CLE                                                              |        |        | 07-11-2024 Staples 002.jpg  |
| 07/11/2024 10:52 AM                                                                | No CBI | No PII | Photographer: Grace Tapulgo |
| [Building/Area]                                                                    |        |        | [Geographic Coordinates]    |
| Manifest 200229445CLE from 08/18/2022 missing signature from destination facility. |        |        |                             |



|                                                                                   |        |        |                              |
|-----------------------------------------------------------------------------------|--------|--------|------------------------------|
| [Title]                                                                           |        |        | IMG_0311.jpg                 |
| [Image Capture Date]                                                              | No CBI | No PII | Photographer: Facility photo |
| CAA                                                                               |        |        | [Geographic Coordinates]     |
| Photo from facility documenting corrective action taken following the inspection. |        |        |                              |



|                                                                                   |        |        |                              |
|-----------------------------------------------------------------------------------|--------|--------|------------------------------|
| [Title]                                                                           |        |        | IMG_0312.jpg                 |
| [Image Capture Date]                                                              | No CBI | No PII | Photographer: Facility photo |
| Northeast Corner                                                                  |        |        | [Geographic Coordinates]     |
| Photo from facility documenting corrective action taken following the inspection. |        |        |                              |



|                                                                                   |        |        |                              |
|-----------------------------------------------------------------------------------|--------|--------|------------------------------|
| [Title]                                                                           |        |        | IMG_0313.jpg                 |
| [Image Capture Date]                                                              | No CBI | No PII | Photographer: Facility photo |
| Northeast Corner                                                                  |        |        | [Geographic Coordinates]     |
| Photo from facility documenting corrective action taken following the inspection. |        |        |                              |



|                                                                                   |        |        |                              |
|-----------------------------------------------------------------------------------|--------|--------|------------------------------|
| [Title]                                                                           |        |        | IMG_0314.jpg                 |
| [Image Capture Date]                                                              | No CBI | No PII | Photographer: Facility photo |
| Northeast Corner                                                                  |        |        | [Geographic Coordinates]     |
| Photo from facility documenting corrective action taken following the inspection. |        |        |                              |



|                                                                                   |        |        |                              |
|-----------------------------------------------------------------------------------|--------|--------|------------------------------|
| [Title]                                                                           |        |        | IMG_0315.jpg                 |
| [Image Capture Date]                                                              | No CBI | No PII | Photographer: Facility photo |
| Northeast Corner                                                                  |        |        | [Geographic Coordinates]     |
| Photo from facility documenting corrective action taken following the inspection. |        |        |                              |



|                                                                                   |        |        |                              |
|-----------------------------------------------------------------------------------|--------|--------|------------------------------|
| [Title]                                                                           |        |        | IMG_0316.jpg                 |
| [Image Capture Date]                                                              | No CBI | No PII | Photographer: Facility photo |
| Northeast Corner                                                                  |        |        | [Geographic Coordinates]     |
| Photo from facility documenting corrective action taken following the inspection. |        |        |                              |

**APPENDIX 2: DOCUMENT LOG**

| Document Type      | Document Name                            | Contains CBI | Contains PII | Uploaded By | Date Received |
|--------------------|------------------------------------------|--------------|--------------|-------------|---------------|
| Personnel Training | Kevin Training.pdf                       | No           | No           | Jon Jones   | 07/16/2024    |
| Personnel Training | Rich Training.pdf                        | No           | No           | Jon Jones   | 07/16/2024    |
| Communications     | Staples Visit Items.msg                  | No           | No           | Jon Jones   | 07/16/2024    |
| Manifests          | M#200229445CLE.pdf                       | No           | No           | Jon Jones   | 07/16/2024    |
| Manifests          | M#200798337CLE.pdf                       | No           | No           | Jon Jones   | 07/16/2024    |
| Weekly Inspections | Weekly Inspection Completed by Date.xlsx | No           | No           | Jon Jones   | 07/16/2024    |
| Weekly Inspections | Weekly Inspection Report.pdf             | No           | No           | Jon Jones   | 07/16/2024    |
| Communications     | Staples Placard Pictures.msg             | No           | No           | Jon Jones   | 07/16/2024    |