

RCRA Inspection Report

1) Inspector and Author of Report

Tarin Tischler
Life Scientist
Phone: 404-562-9702
Tischler.tarin@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Alexis Wilson
Physical Scientist
Phone: 404-562-9072
Wilson.Alexis@epa.gov

2) Facility Information

Safety Kleen Systems, Inc.
161 Industrial Loop S
Orange Park, FL 32073-6259

EPA ID#: FLD980847214
NAICS #: 562112 – Hazardous Waste
Collection

3) Responsible Officials

Thomas Cozzie
Environmental Compliance Manager
cozzie.thomas@safety-kleen.com

4) Inspection Participants

Don Zahner, Safety-Kleen Systems, Inc.
Jon Tullous, Safety-Kleen Systems, Inc.
Thomas Cozzie, Safety-Kleen Systems,
Inc.

Cheryl Mitchell, FDEP
Tarin Tischler, US EPA
Alexis Wilson, US EPA

5) Date of Inspection

March 7, 2025 8:00 AM

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279;

Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.)

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.180(1) [40 C.F.R. § 264, Subpart BB], owners and operators of hazardous waste treatment, storage, and disposal facilities accumulating hazardous waste in tanks must comply with the RCRA Subpart BB Organic Air Emission Standards for Equipment Leaks, including, but not limited to, the recordkeeping requirements of Fla. Admin. Code Ann. r. 62-730.180(1) [40 C.F.R. § 264.1064].

Pursuant to Fla. Admin. Code Ann. r. 62-730.180(1) [40 C.F.R. § 264, Subpart CC], owners and operators of hazardous waste treatment, storage, and disposal facilities accumulating hazardous waste in tanks must comply with the RCRA Subpart CC Organic Air Emission Standards for Tanks, Surface Impoundments, and Containers, including, but not limited to, the recordkeeping requirements of Fla. Admin. Code Ann. r. 62-730.180(1) [40 C.F.R. § 264.1089].

FDEP Hazardous Waste Container and Tank Storage Facility Operating/Corrective Action Permit Number 0077130-011-HO.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Safety Kleen Systems, Inc. compliance with the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection.

8) Facility Description

Safety-Kleen Systems, Inc. (hereinafter “SK” or “the facility”) is a commercial treatment, storage, and disposal facility (TSDF) of hazardous waste (HW). The facility stores, processes, transfers, and transports hazardous waste, universal wastes, used oil and used oil filters, new and spent parts, washer solvents, and used antifreeze.

Safety-Kleen Systems, Inc. has been operating at this location for approximately 30 years and employs 20 staff, including 7 drivers. The facility’s hours of operation are 7:00 AM - 4:00 PM Monday through Friday.

SK is notified as a large quantity generator, a transporter, and a transfer facility of HW. In addition, Safety-Kleen notified as a large quantity handler of universal wastes (UW). The facility is also a used oil transporter and transfer facility.

SK provides its customers with parts washing equipment, clean parts washer solvent and motor oil in addition to its waste pickup services. The facility services customers within a 100-mile radius of the Orange Park location. Safety-Kleen’s parts washer customers provide Safety-Kleen with information on how the washers will be used. This information is used to determine what hazardous waste characteristics the spent solvent generated at their facility will have. The customers also can rely on annual analysis and characterizations performed on spent solvent picked up from their facility.

SK’s most recent hazardous waste generator notification via EPA form 8700-12, which was submitted on January 15, 2025, characterized the facility as a large quantity generator (LQG) of hazardous waste, generating D001-D011, D0018-D019, D021-D030 and D032-D043 and F001-F005.

FDEP issued permit #0077130-011-HO to SK on February 1, 2024. This permit expires December 20, 2028. Permitted hazardous waste units and operations at the facility include Hazardous Waste Transfer areas, two Container Storage Areas, the Solvent Return/Fill Station, and the Aboveground Storage Tank Farm.

9) Previous Inspection History

Florida Department of Environmental Protection (FDEP) conducted three RCRA CEIs at the subject facility between 2020 and 2024 and found three violations during those inspections.

On April 24, 2024, FDEP conducted the most recent RCRA CEI at the subject facility and found one apparent violation of FDEP’s requirements for improper disposal of used oil filters. This violation was resolved without enforcement action.

10) Opening Conference

On March 7, 2025, EPA inspectors Tarin Tischler and Alexis Wilson, accompanied by FDEP inspector Cheryl Mitchell, arrived at SK at approximately 8:00 AM. Don Zahner, Branch Manager, and Jon Tullous, Service Delivery Manager, immediately received the inspectors. The facility representatives and the inspectors were joined by Thomas Cozzie, Regional Compliance

Manager, via phone for the opening conference. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

The facility provided an overview of the SK's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Transfer facility storage area

Inspectors began the walkthrough in the 10-day hazardous waste transfer facility storage area. Waste in this area is collected from customers by Safety-Kleen drivers and stored on-site for 10 days or less. Safety-Kleen maintains profiles for all customer waste streams and prints the labels on site. Hazardous waste is marked with a white label and nonhazardous waste is marked with a blue label. The labels contain the DOT UN shipping number and a barcode to scan the container information into the facility's internal online system (Photos 1-8).

At the time of the inspection, inspectors observed twenty-two 55-gallon drums staged for shipment in the transfer facility. Fifteen of these containers held hazardous waste. These drums were loaded onto a truck for shipment during the facility walkthrough.

Inspectors observed sixty-nine 55-gallon drums, two 30-gallon drums, and one 5-gallon drum in the second part of the transfer facility storage area. Twenty-four 55-gallon containers and two 30-gallon containers held hazardous waste. All containers of hazardous waste in this area were marked with the words "hazardous waste," an indication of the contents' hazards, and the date the containers were transported from the generator to the transfer facility.

Inspectors observed eight 275-gallon totes along the wall of the transfer storage area. Six of these totes held flammable hazardous waste diesel and two held nonhazardous waste. Five of the hazardous waste containers were dated 3/4/25 and one was missing a date (Photo 12). The information for the hazardous waste totes was reviewed in the operating log during the records review. Per the operating log, four totes arrived at the facility on March 4, one on March 5 and one on March 6, 2025. This was corrected on site. The nonhazardous waste containers were dated 3/6/25.

CAA

SK manages a central accumulation area for waste generated on-site adjacent to the transfer storage area. Waste generated on site is placed into containers and marked with the words “hazardous waste,” an indication of the contents’ hazards, and an accumulation date (Photos 9-10). Aerosol cans and oil or oily water samples are accumulated in satellite containers which are marked with an accumulation date and brought to the CAA when full. Inspectors observed the following containers in the central accumulation area at the time of the inspection:

- Three 55-gallon containers labeled with the words “hazardous waste, toxic,” and marked with a DOT flammable diamond. The containers were dated 2/16/25, 2/28/25, and 3/4/25.
- One 65-gallon overpack drum labeled with the words “hazardous waste, toxic,” and marked with a DOT flammable diamond. This container was dated 2/10/25.
- Two 55-gallon containers labeled “used oil.”
- One 55-gallon container marked with a product diesel oil label (Photo 11). Facility representatives were not able to identify if this container held product or if the drum had been recycled to store used oil. This deficiency was corrected following the inspection on April 15, 2025 when the facility informed inspectors via email that the container was determined to hold product for truck oil.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

Inspectors observed fire extinguishers, alarms, spill kits, and a telephone in the warehouse with the transfer facility storage area and CAA (Photo 15). A 4 ft box of universal waste lamps generated onsite was observed in the corner of the warehouse. This container was closed, marked with the words “universal waste, waste lamps” and dated 4/22/2024 (Photos 35-36).

Sample Storage Cage

SK collects samples from customers who send used oil and oily water for recycling via vacuum truck. Samples are collected in 2-oz or 8-oz containers and transported via Fed Ex to a third-party testing location for further analysis to ensure proper disposal. The samples are stored in a closed cabinet on shelves within an area closed with a chain fence. The shelf is organized by collection date, with three shelves for waste collected in the last three months (Photos 13-14).

SK manages a SAA in the sample storage cage for managing hazardous waste aerosol cans and waste oily material samples. The aerosol cans are generated after use in the warehouse and moved to the 55-gallon satellite container when they become waste. The oily material samples are generated as waste after most of the samples are shipped for analysis. Samples are stored on the shelves in the order they are received. The facility maintains the samples for 90 days in case further analysis of the material is required. After 90-days, the samples are purged in the satellite container.

The inspectors observed two 55-gallon drums in this SAA, one for aerosols and one for oil samples. The drums were located near the doorway of the sample storage cage, adjacent to the cabinet. The SAA containers were equipped with a latched lid, and both containers were marked with the words "hazardous waste." The oil sample container was marked as flammable, and the aerosol cans were marked as toxic and flammable. Inspectors informed facility representatives that satellite accumulation containers have an accumulation volume limit of 55-gallons. The facility informed inspectors that they would designate two separate satellite areas for these containers going forward, to maintain 55-gallons or less per satellite.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Receiving Dock / Return and Fill Station

All waste transported to the facility is unloaded onto the receiving dock and brought to the appropriate waste storage area. SK manages a return and fill station on-site for spent parts washer solvent generated at customer facilities. The return and fill station is located north of the transfer facility container storage area, directly past the receiving dock.

SK operates a return and fill program for parts washer solvent. A parts washer with an attached 15-gallon container of clean solvent is provided to customers. Equipment is washed in the unit using the solvent, which is continuously recycled from the parts washer back into the same 15-gallon container. SK then periodically collects the used solvent from customers for disposal and replaces the old container with a clean solvent drum at the customer facility. SK takes ownership of the solvent waste upon pickup from the customer, and the solvent waste disposal quantities are including in the facility's biennial report as SK generated waste.

Safety-Kleen brand parts washer solvent used by all customers is nonhazardous and has a flash point of 142 degrees Fahrenheit. Therefore, used solvent is only hazardous waste when customers are rinsing equipment contaminated with hazardous material. As a precaution, SK manages most used solvent under waste profile number 157055. This profile carries EPA waste code D039. If the customer claims it should be managed as nonhazardous waste because no contaminated equipment is used, then an initial TCLP test is conducted to verify the determination before that waste is shipped under a nonhazardous profile. If a customer's spent solvent has additional waste codes, Safety-Kleen's electronic inventory system will automatically transfer all waste codes that are not included on the facility's waste profile to the bulk solvent waste profile to ensure that all applicable waste codes are applied prior to off-site shipment.

At the time of the inspection, the return and fill station consisted of three wet dumpster containers on a raised secondary containment in the receiving dock (Photo 22). One of these wet dumpsters was out of commission at the time of the inspection. The secondary containment area underneath the return and fill was surrounded by a berm on all sides (Photo 23). Facility representatives informed inspectors that two personnel are required to operate the return and fill station. The container is poured into the wet dumpster, then rinsed out and placed on drum dryer brushes inside the unit to drain excess rinsewater and any remaining solvent (Photos 18 and 21). Solvent is accumulated in the bottom of the container during this process before being hard piped directly to the aboveground tank farm. The empty containers are refilled with product solvent and staged to be brought back to customer facilities.

Of the two units in operation, one dump and fill unit is gravity based while the other unit is mechanically operated. The mechanically pumped unit always maintains a low level of solvent in the dumpster container. The dumpster was marked with a hazardous waste label. Once the solvent reaches a certain level in the container, the pump is triggered, and the material is piped directly to the tank farm. The gravity-based unit is not used regularly but is available for emergency use if the operating unit is out of commission. The gravity-based unit does not maintain any level of solvent in the container.

At the time of the inspection, rows of 15-gallon containers of used solvent were staged by the return and fill station waiting disposal into the unit (Photo 25). These containers were labeled with the words "hazardous waste" and marked with the date they were picked up from the customer. Facility representatives informed inspectors that waste solvent containers are labeled with a DOT flammable or toxic placard depending on the customer facility it was generated. Inspectors observed four containers that were missing the accumulation date (Photos 16-17). This was corrected on site.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Inspectors observed a 55-gallon satellite container of contaminated gloves and rags in this area. This container was labeled with the words, "hazardous waste" and an indication of the contents' hazards. Forty 55-gallon containers labeled "used oil filters" were staged by the dock for shipment off site. SK's HW permit designates a portion of the return and fill area for transfer facility storage as well. Inspectors observed two pallets of waste in this area holding three 55-gallon containers of used oil, four 5-gallon container of hazardous waste, and two 25-gallon containers of hazardous waste (Photos 19-20). Double stacked pallets of product recently unloaded in the receiving area were observed (Photo 24)

Above Ground Tank Farm

SK manages three vertical 15,000-gallon above ground storage tanks at the facility; one tank is designated for hazardous waste accumulation and two store used oil (Photos 27-28). The hazardous waste tank accumulates the parts washer solvent piped from the return and fill station, and the used oil tank accumulates off site used oil generated by customers.

The hazardous waste tank is managed under 40 C.F.R. Part 265 Subpart BB and CC air emission standards for hazardous waste tanks and equipment storing hazardous waste with an organic concentration of at least 10 percent by weight for greater than 300 hours. The tank and corresponding equipment are visually inspected daily as required by the facility permit. Contractors perform periodic roof inspections using lifts. All the waste tanks are equipped with an alarm triggered by a pressure float valve as well as a visual gauge (Photo 31). The hard piping connected to the tanks is colored red for piping of hazardous waste and green for product (Photos 29-30). Inspectors observed a spill kit in this area.

Paint Storage Area

SK manages a trailer in the facility parking lot for product storage (Photo 34). No waste was observed in this area.

Inspectors observed a pallet outside of the trailer accumulating thirty-six 5-gallon rusty containers of paint product (Photos 32-33). Facility representatives informed inspectors that the paint was nonhazardous and was staged here for shipment for use at another SK facility.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Preparedness, Prevention, Contingency Plan and Emergency Procedures for Daily Business Operations which was last updated on 1/2/2024.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Don Zahner is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plan includes as an attachment to the contingency plan a list of all emergency equipment at the facility. The list is titled Table 5.8-1 and was not provided as part of the original contingency plan during the records review. The facility provided this list following the inspection. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears up to date. The plan includes the

location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the Preparedness, Prevention, Contingency Plan and Emergency Procedures for Daily Business Operations (and its quick reference guide) was most recently submitted to the local authorities on June 23, 2023.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinators and emergency telephone numbers (Photo 45).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided following the inspection. The inspectors reviewed the RCRA site specific training roster for employee hazardous waste training completed in 2024.

Job descriptions were provided via the facility's permit application. The Permit application, submitted on August 1, 2023, lists the job descriptions for the facility's Branch General Manager, Customer Service Manager, Account Manager, Branch Administrator, Material Handler, Sales and Service Associate, Sales and Service Representative, Oil and Sales Service Representative, Oil/VAC Sales and Service Representative, and Vacuum Sales and Service Representative. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

SK provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above.

Transfer Facility Operating Log

SK tracks waste that enters and leaves the transfer facility in the Operating Log. Inspectors reviewed random dates in operating log to verify the log is maintained daily. The transfer facility operating log documents the date the waste was generated, the generator EPA ID, the date it was picked up and signed by the transporter, the date it was received at the hub, the date it is labeled and tagged for shipment, a description of the waste and all associated waste codes (Photos 40-44).

At the time of the CEI, the operating log demonstrated that the facility was accumulating 116 waste containers. No waste was observed to be accumulated at the facility for longer than 10

days. The SK transporter uses a Texas EPAID number. Inspectors observed that several generator EPA ID numbers were recorded as "CESQG." Some of these generators were verified to have an EPA ID, despite the conditionally exempt EPA ID number. The facility was reminded to ensure the generator ID number is included on the manifest when applicable.

Weekly Inspection Records:

The inspectors reviewed SK's available records of inspections for hazardous waste accumulation areas for May 2024, July 2024, December 2024, February 2025, and March 2025. SK records inspections of branch generated central accumulation areas (CAA) as well as the tank farm and transfer facility storage areas.

The CAA inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations the number of containers, the capacity of the containers, and observations on condition of the containers and labels. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees routinely record inspection observations and subsequent follow-up actions on the inspection log.

Waste Determination Records

Inspectors reviewed the safety data sheet for the clean parts washer solvent during the records review. The SDS demonstrated that the solvent is not RCRA hazardous.

The facility also provided a list of company waste profiles updated in the last year (Photo 37-39). This list included the waste description, profile number, associated waste codes for the profile, and if those waste codes have been changed since last year.

13) Closing Conference

The inspectors conducted the exit meeting at noon with Jon Tullous, Don Zahner, and Thomas Cozzie. During this meeting, the inspectors stated their preliminary conclusions of the inspection. SK agreed to provide operation logs, inspection documentation, training records and safety data sheets by March 18, 2025. On March 18, 2025, Thomas Cozzie provided the requested records via a file transfer link provided by FDEP.

14) List of Attachments

Attachment 1 – Photo Log

15) Signed

TARIN TISCHLER Digitally signed by TARIN TISCHLER
Date: 2025.05.08 09:27:35 -04'00'

Tarin Tischler
Life Scientist

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2025.05.08 10:41:54 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

45 Photos taken on: 3/7/2025

Photos taken by: Tarin Tischler

Photos taken with: EPA iPad

EPA Property Tag: SS8852



[Photo 1]			IMG-20250307085231523154045.jpg
03/07/2025 08:52 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer waste Area			30.18028109, -81.71790798
Label on container in HW Transfer Facility Storage Area			



[Photo 2]			IMG-20250307085315531591802.jpg
03/07/2025 08:53 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer waste Area			30.18023869, -81.71791281
Label on container in HW Transfer Facility Storage Area			



[Photo 3]			IMG-20250307085340534081054.jpg
03/07/2025 08:53 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer Waste Area			30.18027855, -81.71792155
Label on container in HW Transfer Facility Storage Area			



[Photo 4]			IMG-202503070854575457114070.jpg
03/07/2025 08:54 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer Waste Area			30.18025249, -81.71786015
Label on container in HW Transfer Facility Storage Area			



[Photo 5]			IMG-202503070857245724103677.jpg
03/07/2025 08:57 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer Waste Area			30.18028565, -81.71787353
Label on container in HW Transfer Facility Storage Area			



[Photo 6]			IMG-2025030709071471467833.jpg
03/07/2025 09:07 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer Waste Area			30.17992118, -81.71800988
Label on container in HW Transfer Facility Storage Area. This container was RCRA empty at the time of the CEI.			



[Photo 7]			IMG-2025030709093193182419.jpg
03/07/2025 09:09 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer Waste Area			30.17981707, -81.71802899
Label on container in HW Transfer Facility Storage Area			



[Photo 8]			IMG-20250307091113111371436.jpg
03/07/2025 09:11 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer waste Area			30.18013301, -81.71799098
Label on container in HW Transfer Facility Storage Area			



[Photo 9]			IMG-20250307091752175290046.jpg
03/07/2025 09:17 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Container Storage - 90 day			30.17981063, -81.71801968
Label on container in Branch Generated Waste Storage Area			



[Photo 10]			IMG-20250307092122212293457.jpg
03/07/2025 09:21 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Container Storage - 90 day			30.18002119, -81.71800404
Label on container in Branch Generated Waste Storage Area			



[Photo 11]			IMG-20250307092530253090704.jpg
03/07/2025 09:25 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Container Storage - 90 day			30.17982165, -81.71801825
Container marked with a product label in branch generated waste storage area. At the time of the CEI, facility representatives could not verify if this container held product or waste.			



[Photo 12\			IMG-20250307092751275190287.jpg
03/07/2025 09:27 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer Waste Area			30.18001766, -81.71800084
275-gallon tote label in the transfer facility storage area			



[Photo 13]			IMG-2025030709320632676711.jpg
03/07/2025 09:32 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Sample Storage Cage			30.17989681, -81.71799217
Shelf storing used oil/ oily water samples. The shelf was separated by date sample was collected.			



[Photo 14]			IMG-20250307093337333781147.jpg
03/07/2025 09:33 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Sample Storage Cage			30.1801408, -81.71799024
Shelf storing used oil/ oily water samples. The shelf was separated by date sample was collected.			



[Photo 15]			IMG-20250307094240424086122.jpg
03/07/2025 09:42 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Transfer Waste Area			30.18027264, -81.71792589
A functional telephone observed in the transfer storage area.			



[Photo 16]			IMG-20250307094655465595369.jpg
03/07/2025 09:46 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.1802831, -81.71792394
A label on a 15-gallon used solvent container observed in the Return and Fill Station.			



[Photo 17]			IMG-20250307094713471396025.jpg
03/07/2025 09:47 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.1802831, -81.71792394
A label on a 15-gallon used solvent container observed in the Return and Fill Station.			



[Photo 18]			IMG-20250307094914491465699.jpg
03/07/2025 09:49 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.18032681, -81.71789135
Drum dryer observed inside Return and Fill wet dumpster			



[Photo 19]			IMG-2025030709510251283083.jpg
03/07/2025 09:51 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.18026918, -81.71785087
Transfer waste observed near the Return and Fill Station			



[Photo 20]			IMG-20250307095146514689943.jpg
03/07/2025 09:51 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.18034122, -81.71795483
Transfer waste observed near the Return and Fill Station.			



[Photo 21]			IMG-20250307095155515567772.jpg
03/07/2025 09:51 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.18034122, -81.71795483
Drum Dryer in Return and Fill Station wet dumpster.			



[Photo 22]			IMG-20250307095208528101297.jpg
03/07/2025 09:52 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.18037863, -81.71798343
Outside view of Return and Fill wet dumpster.			



[Photo 23]			IMG-202503070953205320105427.jpg
03/07/2025 09:53 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.18044655, -81.71799587
Secondary containment under Return and Fill Station.			



[Photo 24]			IMG-202503070953305330108120.jpg
03/07/2025 09:53 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Dump and Fill			30.18044655, -81.71799587
Product storage near Return and Fill Station,			



[Photo 25]			IMG-20250307100226226103230.jpg
03/07/2025 10:02 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Return and Fill Station			30.18036731, -81.71798458
15-gallon used solvent containers staged near Return and Fill Station.			



[Photo 26]			IMG-2025030710062162173317.jpg
03/07/2025 10:06 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Tank Farm			30.17967845, -81.71829822
Used Oil tank in Tank Farm			



[Photo 27]			IMG-2025030710063463468191.jpg
03/07/2025 10:06 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Tanks			30.18013398, -81.71843607
Hazardous waste tank in Tank Farm.			



[Photo 28]			IMG-20250307100642642116288.jpg
03/07/2025 10:06 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Tanks			30.18001799, -81.71834822
[Description]			



[Photo 29]			IMG-20250307101216121679529.jpg
03/07/2025 10:12 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Tanks			30.17975061, -81.71826805
connection on pipe – this was marked green for product.			



[Photo 30]			IMG-202503071012321232100958.jpg
03/07/2025 10:12 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Tanks			30.17982097, -81.71818582
BB connection on tank piping. This connection appeared to be sealed at the time of the inspection.			



[Photo 31]			IMG-20250307101548154869524.jpg
03/07/2025 10:15 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Tanks			30.18008728, -81.7182129
Visual gauge in front of used oil tank.			



[Photo 32]			IMG-202503071019501950114225.jpg
03/07/2025 10:19 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Product Storage			30.18053253, -81.71795428
Rusty cans of paint product outside product storage trailer.			



[Photo 33]			IMG-202503071019551955115520.jpg
03/07/2025 10:19 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Product storage			30.18053668, -81.71795898
Rusty paint cans observed outside product storage.			



[Photo 34]			IMG-20250307102152215290282.jpg
03/07/2025 10:21 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Procut Storage			30.18045667, -81.71791028
Paint storage area			



[Photo 35]			IMG-20250307102722272296600.jpg
03/07/2025 10:27 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
UW			30.17997032, -81.71800556
Label on Universal Waste Lamps			



[Photo 36]			IMG-20250307102730273072675.jpg
03/07/2025 10:27 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Paint storage area			30.17996354, -81.71801285
UW Lamps container			

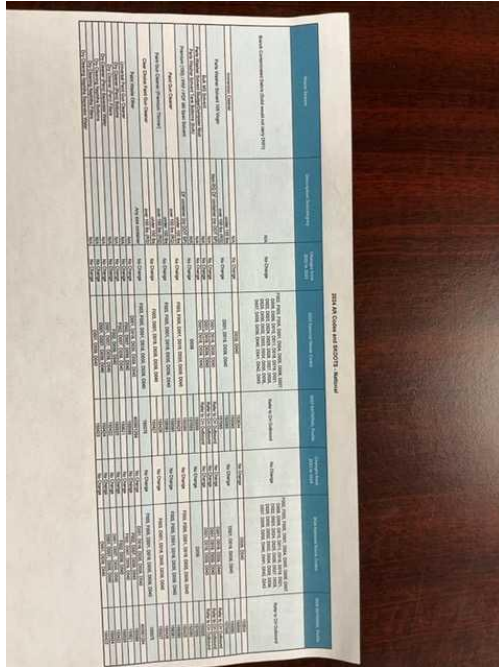
2024 AR Codes and SKDOTS - National

Waste Stream	Description Subcategory	Changes from 2022 to 2023	2023 National Waste Codes	2023 National Resource
Branch Contaminated Debris (Solid would not carry D001)	N/A	No Change	F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043	Refer to CH Outbox
Immersion Cleaner	N/A	No Change	D035, D040	133634
Parts Washer Solvent 105 Virgin	under 100 lbs	No Change	D001, D018, D035, D040	150545
	over 100 lbs (RC)			150545
	Non-RC DF container (no DOT SP)			157045
Bulk MS Solvent	N/A	No Change	D001, D018, D035, D040	Refer to CH Outbox
Parts Washer Solvent Sludge/Cumputer Mud	N/A	No Change	D001, D018, D035, D040	Refer to CH Outbox
Parts Washer Solvent Tank Bottoms (bulk)	N/A	No Change	D001, D018, D035, D040	Refer to CH Outbox
Premium (150) / PRF / PDF MS Spec Solvent	N/A	No Change	D039	150555
	DF container (no DOT SP)			157055
Paint Gun Cleaner	under 100 lbs	No Change	F003, F005, D001, D018, D035, D039, D040	150565
	over 100 lbs (RC)			150565
Paint Gun Cleaner (Premium Thinner)	under 100 lbs	No Change	F003, F005, D001, D018, D035, D039, D040	150565
	over 100 lbs (RC)			150565
Clear Choice Paint Gun Cleaner	under 100 lbs	No Change	F003, D001, D018, D035, D039, D040	150565
	over 100 lbs (RC)			150565
Paint Waste Other	Any size container	No Change	F003, F005, D001, D018, D035, D039, D040	150565
Universal Paint Gun Cleaner	N/A	No Change	D001, D018, D035, D039, D040	40501129
Dry Cleaner (Peric) Bottoms	N/A	No Change	F003, D007, D035, D040	150565
Dry Cleaner (Peric) Filters	N/A	No Change	F003, D007, D035, D040	150565
Dry Cleaner (Peric) Separator Water	N/A	No Change	D001, D007, D039, D040	150422
Dry Cleaning Naphtha Bottoms	N/A	No Change	D001, D007, D039, D040	150422
Dry Cleaning Naphtha Filters	N/A	No Change	D001, D039, D040	150422
Dry Cleaning Naphtha Separator Water	N/A	No Change		

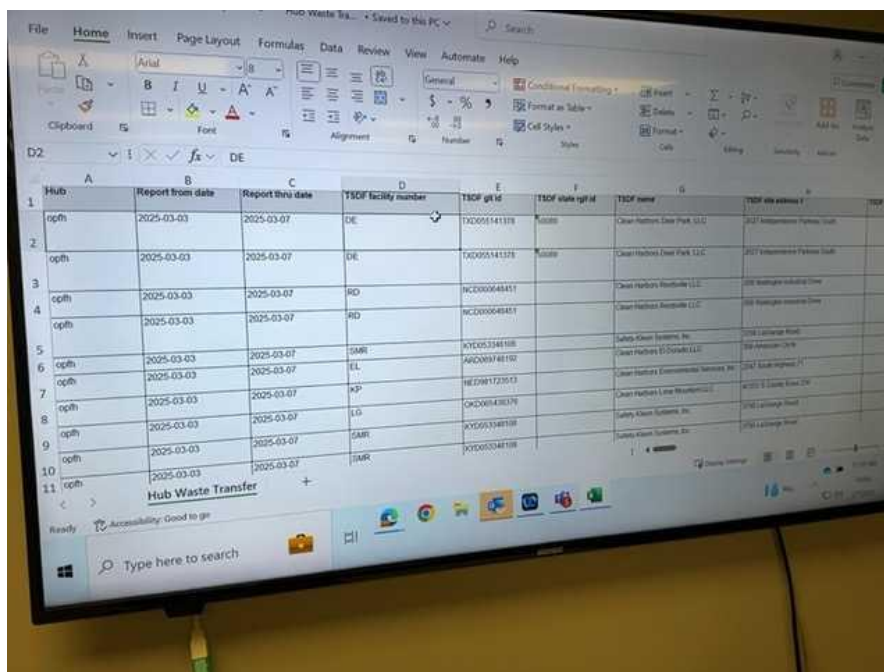
[Photo 37]			IMG-202503071039253925110211.jpg
03/07/2025 10:39 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.17992381, -81.71800224
Waste profile updates			

Waste Stream	Description Subcategory	Changes from 2022 to 2023	2023 National Waste Codes
Branch Contaminated Debris (Solid would not carry D001)	N/A	No Change	F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043
Immersion Cleaner	N/A	No Change	D039, D040
Parts Washer Solvent 105 Virgin	under 100 lbs over 100 lbs (RQ) Non-RQ DF container (no DOT SP)	No Change	D001, D018, D039, D040
Bulk MS Solvent	N/A	No Change	D001, D018, D039, D040
Parts Washer Solvent Sludge/Dumpster Mud	N/A	No Change	D001, D018, D039, D040
Parts Washer Solvent Tank Bottoms (bulk)	N/A	No Change	D001, D018, D039, D040
Premium (150) / PRF / PDF Mil Spec Solvent	N/A DF container (no DOT SP)	No Change	D039
Paint Gun Cleaner	under 100 lbs over 100 lbs (RQ)	No Change	F003, F005, D001, D018, D035, D039, D040
Paint Gun Cleaner (Premium Thinner)	under 100 lbs over 100 lbs (RQ)	No Change	F003, F005, D001, D018, D035, D039, D040
Clear Choice Paint Gun Cleaner	under 100 lbs over 100 lbs (RQ)	No Change	F003, D001, D018, D039, D040
Paint Waste Other	Any size container	No Change	F003, F005, D001, D018, D035, D039, D040
Universal Paint Gun Cleaner	N/A	No Change	D001, D018, D035, D039, D040
Dry Cleaner (Perc) Bottoms	N/A	No Change	F002, D007, D039, D040
Dry Cleaner (Perc) Filters	N/A	No Change	F002, D039, D040
Dry Cleaner (Perc) Separator Water	N/A	No Change	D001, D007, D039, D040
Dry Cleaning Naphtha Bottoms	N/A	No Change	D001, D007, D039, D040
Dry Cleaning Naphtha Filters	N/A	No Change	D001, D039, D040
Dry Cleaning Naphtha Separator Water	N/A	No Change	

[Photo 38]			IMG-202503071039293929120876.jpg
03/07/2025 10:39 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.17983646, -81.71801022
Waste Profile updates – Parts washer solvent is still managed as D039 unless otherwise specified by customer.			



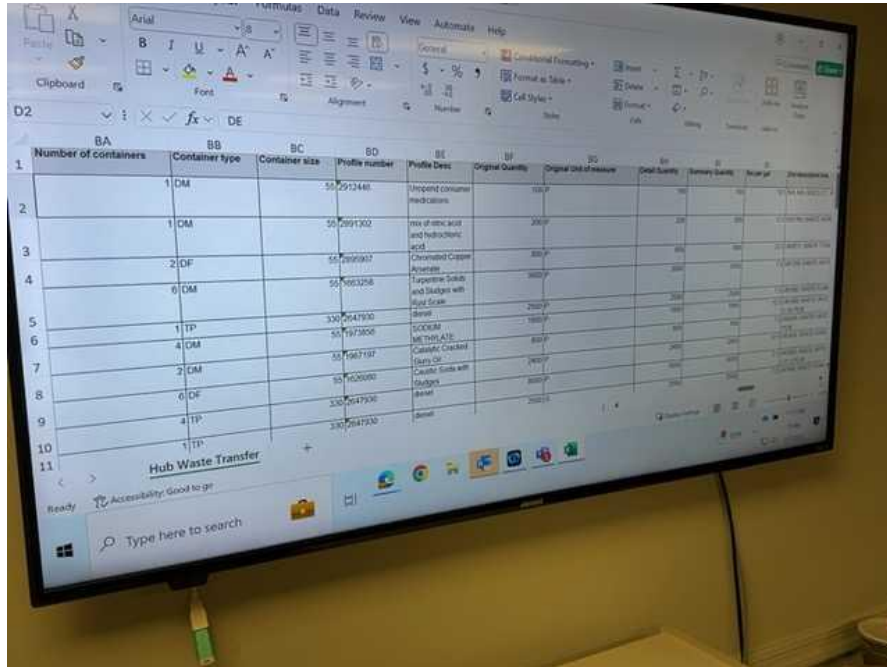
[Photo 39]			IMG-20250307103944394496423.jpg
03/07/2025 10:39 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.17983645, -81.71801022
Full view waste profile updates			



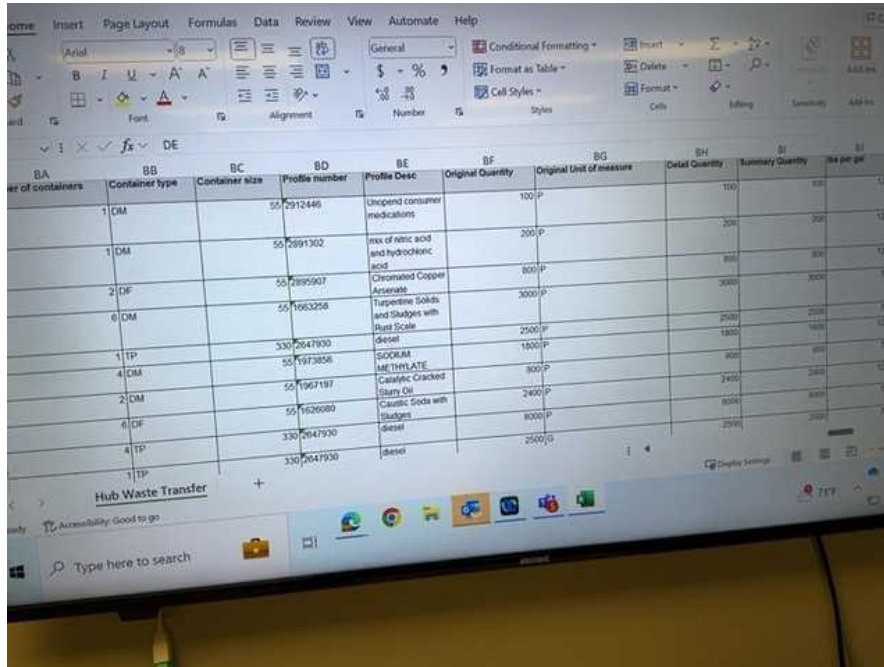
[Photo 40]			IMG-20250307111057105776449.jpg
03/07/2025 11:10 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.17982057, -81.71804029
Transfer Facility Operations Log			

	AA	AB	AC	AD	AE	AF	
	GENR phone no	TSDf date	GENR date	Hub Receipt Date	Hub Ship Date	Move activity Date	Moves
1	3864185045		2025-03-05	2025-03-05		2025-03-06	
2	3863411131		2025-03-04	2025-03-04		2025-03-05	
3	9125902262		2025-03-05	2025-03-05		2025-03-06	
4	9125902262		2025-03-05	2025-03-05		2025-03-06	
5	9125902262		2025-03-05	2025-03-05		2025-03-06	
6	9125902262		2025-03-05	2025-03-05		2025-03-06	
7	9125902262		2025-03-05	2025-03-05		2025-03-06	
8	9125902262		2025-03-05	2025-03-05		2025-03-06	
9	9125902262		2025-03-04	2025-03-04		2025-03-05	
10	9125902262		2025-03-06	2025-03-06		2025-03-07	
11	9125902262						

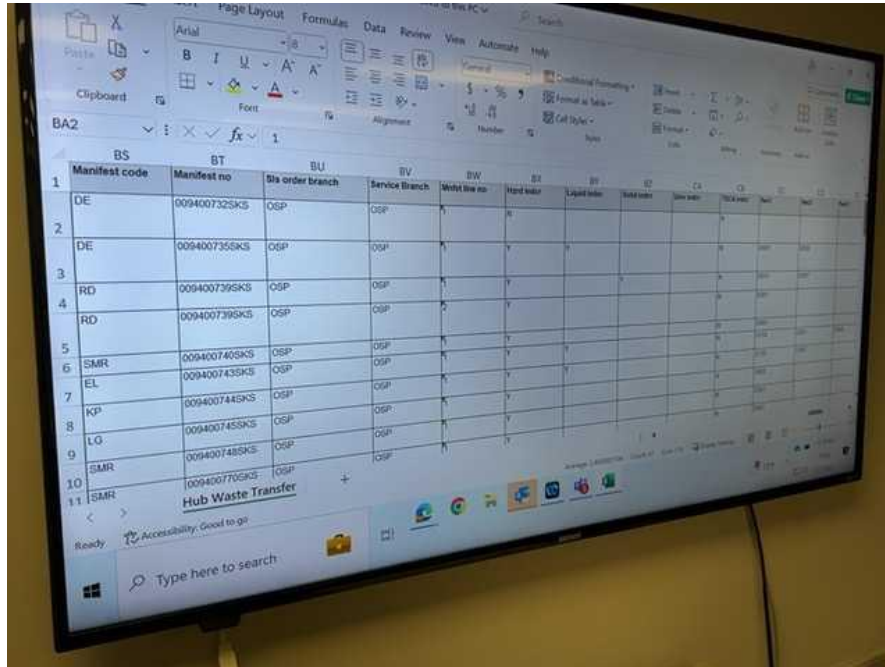
[Photo 41]			IMG-20250307111217121773759.jpg
03/07/2025 11:12 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.17980813, -81.71801502
Transfer Facility Operations Log			



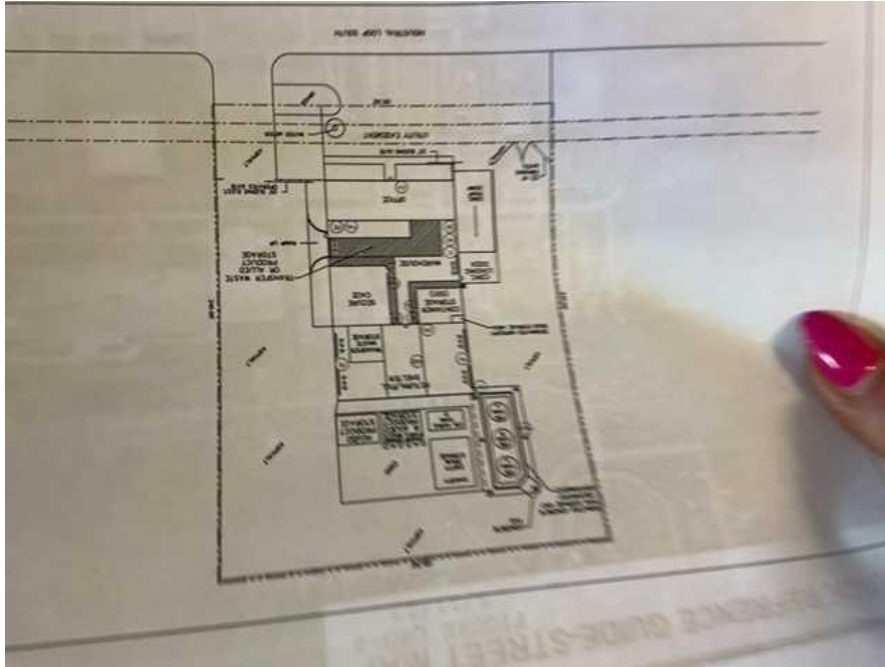
[Photo 42]			IMG-20250307111551155170507.jpg
03/07/2025 11:15 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.1803645, -81.71796315
Transfer Facility Operations Log			



[Photo 43]			IMG-20250307111555155575569.jpg
03/07/2025 11:15 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.18030046, -81.71796139
Transfer Facility Operations Log			



[Photo 44]			IMG-20250307111843184372266.jpg
03/07/2025 11:18 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.17980273, -81.71798748
Transfer Facility Operations Log			



[Photo 45]			IMG-20250307113620362057862.jpg
03/07/2025 11:36 AM (ET)	No CBI	No PII	Photographer: Tarin Tischler
Records			30.17977882, -81.71799035
QRG Site Map			