Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Bay Line Railroad LLC

On-Site Inspection Start Date: 09/25/2017 **On-Site Inspection End Date:** 09/25/2017

ME ID#: 56074 **EPA ID#:** FLD984229906

Facility Street Address: 2037 Industrial Dr, Panama City, FL 32405-6033

Contact Mailing Address: 2037 Industrial Dr, Panama City, FL 32405

County Name: BAY **Contact Phone:** (850) 785-4609

NOTIFIED AS:

Non-Handler

Transporter

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector:	Paige L Plier, Inspector
Other Participants:	Corinna Clanton, Inspector; Nicole Hetzel, Inspector; David Nunnery, Mechanical Manager

LATITUDE / LONGITUDE: Lat 30° 10' 58.1222" / Long 85° 38' 36.9654"

SIC CODE: 4011 - Trans. & utilities - railroads, line-haul operating

TYPE OF OWNERSHIP: Private

Introduction:

The Bay Line Railroad (BAYL) is a 103-mile short line railroad that interchanges with CSX Transportation, Norfolk Southern, and Hilton & Albany Railroad. Commodities transported include aggregates, brick and cement, chemicals, coal, food and feed products, metallic ores and minerals, and steel and scrap. BAYL was acquired by Genesee & Wyoming in 2005. BAYL is registered with the Department to transport hazardous waste through November 30, 2018. The last inspection conducted at this facility for compliance with hazardous waste transporter requirements and used oil regulations was on May 14, 2015 with no violations noted.

Process Description:

BAYL currently operates with 23 employees working Monday through Friday. The current shop/mechanical manager is Mr. David Nunnery. This facility, located at 1 Edwards Drive, Panama City, FL, operates as a storage yard, maintenance, and refueling/wash station for locomotives. The main office is connected to the maintenance building, north of the refueling/wash station.

The drains in the maintenance area and refueling/wash station lead to a system of two water/oil separators prior to storage in the used oil tank or discharge into the city sewer system. The first water/oil separator collects residues and the second targets metal concentrations. Oil from the separator goes to the used oil tank and industrial wastewater is discharged to the city sewer system. In an effort to reduce the amount of water sent to the city sewer system and as an NPDES best management practice BAYL installed a new roof and walled structure over the refueling/wash station (Photo 1).

BAYL transports only one regulated hazardous waste – terpene burn material (D001, F003) generated by

Kraton Chemical in Panama City. BAYL is the initial transporter.

On September 25, 2017, Department personnel Paige Plier, Corinna Clanton, and Nicole Hetzel, performed an unannounced inspection of BAYL to ensure compliance with the Resource Conservation and Recovery Act (RCRA). Lucas Grantham, a DEP inspector, was also present to investigate the facilities NPDES/stormwater management. The inspection was facilitated by Mr. Nunnery and included a visual overview of the locomotive maintenance building, refueling/wash station, water/oil separators, tank storage area, universal waste battery storage, and a review of the facility's records.

Maintenance Building:

There was one 55-gallon container of non-RCRA petroleum-impacted sand waste. It was closed and labeled. Used oil filters, pads, rags, etc. were collected in a 3-yard dumpster container. Another 55-gallon container was being used for the collection of used oil filters only. Both containers were labeled and stored indoors (Photos 2-3). One Safety Kleen parts washer was in this building affixed to a 35-gallon drum. There was also a 55-gallon container with a can puncturing device to collect aerosol residues. It was labeled and closed. The empty cans are collected for recycling. No issues were noted.

Within this building a portion of the floor is lowered to access the underside of locomotives. Items being stored on the lower deck included a 55-gallon container for paint skimmings within a secondary containment barrel with adequate labeling. The container was securely closed during the inspection. There was also one 4-ft cardboard container of universal waste lamps that was labeled and dated 1/19/17. The container lid was not securely closed but was fixed during the inspection (Photo 4).

The maintenance building was equipped with emergency response and spill kit equipment.

Water/Oil Separators:

The first water/oil separator is west of the maintenance building next to a gravel road. It consists of the separator unit, two solution tanks, and a 55-gallon drum for the collection of used oil sludges. The whole unit is situated within a sealed secondary containment berm. The 55-gallon drum was not labeled as "Used Oil." Mr. Nunnery corrected this deficiency while the inspectors were on site (Photo 5). The second water/oil separator is located within the refueling/wash station behind the maintenance building. The oil sludge from this unit is diverted directly to the used oil storage tank.

Tank Storage:

This area is referred to as "The Pit" by BAYL employees. The Pit consists of 5 aboveground storage tanks within a sealed concrete secondary containment structure (Photo 6). Materials being stored include diesel fuel and used oil from the water/oil separators. Used Oil is stored in a 15,000-gallon tank. All tanks appeared to be in good condition. No issues were noted.

Battery Storage:

BAYL accumulates locomotive batteries on site for recycling. Batteries are stored under a roof structure that is connected to a storage shed southeast from the maintenance building. One pallet of batteries was not fully covered by the roof (Photo 7). The batteries were moved under the roof and photo documentation was provided to the Department on October 3, 2017 via electronic communication.

Records Review:

Hazardous waste manifests were available at the facility's administrative office located less than a mile away at 2037 Industrial Drive, Panama City, FL. These manifests showed CSX (FLD006921340) and Norfolk Southern (VAD000650309) as the secondary transporters. MSO dba ND&W Railway (OHR000134445) is an occasional tertiary transporter. The destination facility is Eco Services Operations (LAD008161234). Manifests showed shipments of hazardous waste about once every month. Transporter loads range from 22,222 to 23,500 gallons.

Aaron Oil Company (ALD983180233) transports the facility's used oil waste. About every two months, Safety Kleen services the parts washer in the maintenance building and recycles the resulting mineral spirits waste

and paint wastes. Mr. Nunnery was unable to locate Saftey Kleen receipts for inspectors to review while onsite, but followed up with the Department on October 3, 2017 with the required documentation through electronic communication. Schnitzer Southeast, LLC and Sanders Lead Company Inc., recycle the facility's spent locomotive batteries. Scrap metal is taken to Lewis Metals for recycling.

Employee training is managed through an online system called "Safe Tracks." Training is conducted immediately upon hire and renewed annually.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(c)(1)
Question Number:	5.4
Question:	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)
Explanation:	One container being used to collect Oil sludges from the water/oil separator did not have a label on it.
Corrective Action:	A label was applied during the inspection. See Photo 5. This violation was corrected.

Type:	Violation
Rule:	62-730.030(3)
Question Number:	2.8
Question:	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)
Explanation:	At the time of the inspection, the manager could not locate the records from the Safety Kleen parts washer service history.
Corrective Action:	The manager followed up with the Department with the required documentation on October 3, 2017. See electronic communication activity. This violation was addressed after the inspection and is now compliant.

Type:	Violation
Rule:	62-737.400(5)
Explanation:	The lid to the universal waste lamp container was not securely closed.
Corrective Action:	The manager fixed this deficiency during the inspection. See Photo 4. This violation was corrected while the inspectors were onsite.

Type:	Violation
Rule:	273.33(a)(1)
Explanation:	One pallet of locomotive batteries was not protected from the weather or in a way to prevent releases.
Corrective Action:	The batteries were relocated after the inspection and picture documentation of return-to-compliance efforts were provided to the Department via electronic communication on October 3, 2017. This violation was corrected.

PHOTO ATTACHMENTS:

Photo 1 - New Roof Structure

Photo 2 - Used Oil Waste

Photo 3 - Used Oil Filters

Photo 4 - Universal Waste Lamps

Photo 5 - Labeled Used Oil sludge: water/oil separator

Photo 6 - Tank Storage

Photo 7 - Locomotive Batteries (Pallet moved under roof on 10/3/17)

Conclusion:

Based on the information provided during and following the inspection, the facility is in compliance with State and Federal hazardous waste transporter requirements.

1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✔		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✔		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✔		

2.0 - CESQG Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Standards for Conditionally Exempt Small Quantity Generators	Yes	No	N/A
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 261.5	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? 261.5			✓
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 261.5	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 261.5			✓
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 ☐ Is it excluded under 261.4? ☐ Is it listed in subpart D of 261 or appendix IX of 261? ☐ Has the waste been analyzed? ☐ Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 261.5(g)(3) ☐ Name and address of the generator and TSD/authorized facility. ☐ Type and amount of hazardous waste delivered. ☐ Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)		✓	

5.0 - Used Oil Generator Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✔		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✔		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✔		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)		✔	
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)	✔		
Item No.	Secondary Containment	Yes	No	N/A
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✔		
5.9	Stored on an oil-impermeable surface? 62-710.401(6)			✔
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✔		
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✔		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✔		
Item No.	Used Oil Releases	Yes	No	N/A
5.15	stop the release? 279.22(d)(1)			✔
5.16	contain the released oil? 279.22(d)(2)			✔
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✔
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✔
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✔		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✔		
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✔		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✔		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✔		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✔		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✔		
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✔		

Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.28	stop the release? 62-710.850(5)(b)(1)			✓
5.29	contain the released oil? 62-710.850(5)(b)(2)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)(b)(3)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 62-710.850(5)(b)4.			✓
Item No.	**Used Oil Mixtures**	**Yes**	**No**	**N/A**
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			✓
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	**Space Heaters**	**Yes**	**No**	**N/A**
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	**Off-site Shipments**	**Yes**	**No**	**N/A**
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)			✓
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓

6.0 - Transporters Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Transporter Requirements (62-730.170 & 40 CFR 263)	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) ☐ Exemption Type - Tolling Agreement ☐ Exemption Type - CESQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)(1)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)(2)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	**Rail Transporters**	**Yes**	**No**	**N/A**
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)	✓		
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)	✓		
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)	✓		
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)	✓		
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)	✓		
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)	✓		
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)	✓		
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)	✓		
Item No.	**Water (Bulk) Transporters**	**Yes**	**No**	**N/A**
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓

Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✔
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ The date the waste is accepted			✔
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✔
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✔
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✔
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✔
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✔
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)? 62-730.150(2)			✔
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✔

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

Paige L Plier	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
	DEP	10/04/2017
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Corinna Clanton	Inspector
Inspector NAME	**Inspector TITLE**
	DEP
	ORGANIZATION

Nicole Hetzel	Inspector
Inspector NAME	**Inspector TITLE**
	DEP
	ORGANIZATION

David Nunnery	Mechanical Manager
Representative NAME	**Representative TITLE**
	BAYL
	ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver: Brad T Hartshorn **Inspection Approval Date:** 10/05/2017