



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 29 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles Buckley
Orlando Operations Manager
Triumvirate Environmental, Inc.
10100 Rocket Boulevard
Orlando, Florida 32824

SUBJ: Resource Conservation Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Triumvirate Environmental, Inc. (EPA ID #: FLD 980 559 728)

Dear Mr. Charles Buckley:

On July 14, 2014, an Environmental Protection Agency (EPA) lead RCRA CEI was conducted by the EPA and the Florida Department of Environmental Protection (FDEP) at Triumvirate Environmental, Inc., in Orlando, Florida, to determine the facility's compliance status with RCRA.

Enclosed is the EPA RCRA CEI report which indicates that apparent violations of RCRA were discovered. If you have any questions regarding the inspection, please contact Brooke York, of my staff, by phone at (404) 562-8025 or by email at york.brooke@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry Lamberth".

Larry Lamberth
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure



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JAN 29 2015

Nathan Hess
Central District Office
Waste Management Program
3319 Maguire Blvd, Suite 232
Orlando, Florida 32803-3767

SUBJ: Resource Conservation Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Triumvirate Environmental, Inc. (EPA ID #: FLD 980 559 728)

Dear Mr. Nathan Hess:

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JAN 29 2015

Glenn Perrigan
Division of Waste Management
MS #4500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Resource Conservation Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Triumvirate Environmental, Inc. (EPA ID #: FLD 980 559 728)

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Larry Lamberth
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

**United States Environmental Protection Agency (EPA)
Region 4, Atlanta, Georgia
Compliance Evaluation and Inspection Report**

1. Inspector and Author of Report

Brooke York
Environmental Engineer
U.S. Environmental Protection Agency
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-8025
York.Brooke@epa.gov

2. Facility Information

Triumvirate Environmental, Inc.
10100 Rocket Boulevard
Orlando, Florida 32824
EPA ID #: FLD 980 559 728
NACIS Code:

3. Responsible Officials

Mr. Charles Buckley
Orlando Operations Manager

4. Inspection Participants

Brooke York, U.S. Environmental Protection Agency (EPA)
Michael Eckoff, Florida Department of Environmental Protection (FDEP)
John White, FDEP
Nicholas Vick, Triumvirate Environmental (Florida), Inc. (TEFI)
Patricia Malloy, TEFI

5. Date of Inspection

July 14, 2014 at 10:00 a.m.

6. Applicable Regulations

40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, & 279
Resource Conservation and Recovery Act (RCRA) Sections 3002 - 3005,

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

7. Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine whether TEFI was in compliance with the applicable requirements of RCRA and the corresponding Florida Regulations. This was an EPA lead inspection.

8. Facility Description

The TEFI is a RCRA permitted treatment, storage and disposal facility, Permit Number 26916-HO-008. The facility is a hazardous waste transporter, 10-day transfer facility, and a permitted used oil processor, and solid and hazardous waste storage facility. The location was previously owned and operated by Perma-Fix. On October 14, 2011 the permit issued to Perma-Fix on January 28, 2009 was officially transferred to TEFI.

9. Previous Inspection History

Date	Inspection/Agency	Findings	Action
April 11, 2013	FDEP held Prearranged Meeting	Discussion of permit renewal and associated topics.	Permit Issued
February 29, 2012	CEI conducted by FDEP	Failure to meet the requirements of 40 C.F.R. § 264.16(d)(2) and (3), 40 C.F.R. § 279.46(a)(2), and 62-710.510(1)	Findings were corrected by facility and no further action was taken.
October 14, 2011	FDEP transferred permit to TEFI	Perma-Fix transferred ownership to TEFI	Permit Transferred

10. Findings

10.1. Arrival and Opening Conference

Upon the inspectors arrival to the facility the inspectors met with Ms. Malloy. The inspectors presented Ms. Malloy with their credentials and explained the purpose of the inspection. Ms. Malloy explained that the Mr. Charles Buckley and Mr. Lee Richardson were not available to escort the inspectors or discuss the operations of the facility. She asked if the inspection could be rescheduled. The inspectors explained the purpose of the inspection and that the nature of the inspection was to get a clear picture of the facility's compliance with the regulations and in order to accomplish this that the agencies must conduct unannounced inspections. Ms. Malloy understood and made a phone call to the appropriate company official to inform them of the inspection.

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions, Condition 12.d states “The Permittee shall comply with the

requirements of 40 C.F.R. § 264.55, concerning the emergency coordinator.” Pursuant to Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 264.55], which requires at all times, there must be at least one employee either on the facility premises or on call (i.e. available to respond to emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of wastes handled, the location of all records within the facility, and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan.

Ms. Malloy introduced the inspectors to Mr. Vick. Mr. Vick was the primary contact for the facility during the inspection. Mr. Vick informed the inspectors that he would do his best to explain the operations of the facility and answer any question that arose but that he was not as knowledgeable about the processes as Mr. Buckley.

10.2. Loading/Un-Loading Dock

Mr. Vick escorted the inspectors to the Dock Area. Inspectors observed approximately 53 containers arranged in 2 rows in the Loading Dock Area. Mr. Vick informed the inspectors that the containers on the Loading Dock had been unloaded earlier that morning.

The nuts and bolts intended to secure the rings on the 55-gallon drums were observed to be improperly tightened.

Hazardous Waste Permit Number: 26916-HO-008 Part II Subpart B.1 – Specific Operating Conditions for Container Management Condition 16 states “All drums shall be kept closed with rings tightened and bungholes plugged except when adding or removing waste.”

The inspectors asked Mr. Vick why the nuts and bolts on the 55-gallon containers were improperly tightened. Mr. Vick told inspectors that each container was opened when it arrived to the Facility to ensure that the material was properly characterized by the generator and in the case of lab packs that the containers were still intact inside the drum.

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions Condition 1 states “The Permittee shall comply with those sections of 40 C.F.R. § 124 specified in Subsection 62-730.200(3), F.A.C., 40 C.F.R. § 260 through 268, and 40 C.F.R. § 270 as adopted in Chapter 62-730, F.A.C., until all hazardous waste permitting operations have ceased and the facility has been closed and released from postclosure care requirements and all facility-wide corrective action requirements.” Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart B.1 – Specific Operating Conditions for Container Management Condition 10 states “The Permittee shall manage all containers, including containers of non-hazardous waste, in the manner outlined in this permit to ensure that a release of hazardous waste or hazardous constituents will not occur.” Pursuant to Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 264.31], which requires that facilities be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Inspectors observed one of the 55-gallon drums generated by the University of South Florida, dated 7/9/2014, which held formaldehyde solution. This container had a non-hazardous waste label placed on top of a hazardous waste label.

Inspectors observed that some of the hazardous waste labels on the containers on the loading dock did not have the manifest number completely filled out as required by 40 C.F.R. § 262.32. (Figure 1)

Inspectors observed a roll off container staged under the roof immediately to the west of the Loading Dock. Mr. Vick informed the inspectors that the container was for the disposal of solid waste intended for RCRA Subtitle D Landfill disposal. At the time of the inspection the container was covered with a tarp. The asphalt on the North end of the container was observed to be stained (Figure 2)

10.3. AES Trailer/Flammable Trailer

At the time of the inspection the fire suppression system in the permitted storage area had not been upgraded to meet the requirements of the fire code. Therefore, TEFI could not store flammable material in the permitted storage area. In an attempt to continue to manage flammable waste a trailer had been placed at one of the loading bays. This container was intended to serve as a 10 day transfer facility. At the time of the inspection the trailer was observed to hold 12 containers that had not been processed into the facility and 31 which had been processed in, for a total of 43 containers. Most of the containers were 55-gallon drums (Figures 3-8).

All of the containers, except one, that had not yet been processed into the facility, were from Halifax Health. The 31 containers that had been processed in to the facility that were stored in the rear of the trailer were stored with no space between the containers. This made it difficult to properly inspect the containers. The containers that had labels that were visible had non-hazardous labels. At least four of these containers appeared to have been relabeled as non-hazardous. The non-hazardous labels that were observed on 3 of the relabeled containers indicated that TEFI was the generator (Figures 5-8).

Some of the drums appeared to be rusty and shown signs of deterioration. One of the drums stored in the rear of the trailer was observed to be bulging under positive pressure. Inspectors ask Mr. Vick for a list of the waste containers on the trailer. However, Mr. Vick was unable to supply the list due to his limited knowledge of the waste tracking system.

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions Condition 1 states “The Permittee shall comply with those sections of 40 C.F.R. § 124 specified in Subsection 62-730.200(3), F.A.C., 40 C.F.R. § 260 through 268, and 40 C.F.R. § 270 as adopted in Chapter 62-730, F.A.C., until all hazardous waste permitting operations have ceased and the facility has been closed and released from postclosure care requirements and all facility-wide corrective action requirements.” Pursuant to Fla. Admin. Code Ann. r. 62–30.180(2) [40 C.F.R. § 264.171], which requires a facility to transfer hazardous waste from containers which are not in good condition, or have begun to leak into containers which are in good condition and manage the waste in accordance with the applicable regulations.

Additional information has been requested regarding the trailer and the 10-day transfer activities at the facility.

Hazardous Waste Permit Number: 26916-HO-008 requires that the containers stored in the transfer facility be inspected at least once weekly. Proper inspection of the containers stored on the AES Trailer was not possible at the time of the inspection due to the lack of aisle space as evident by a 55-gallon container observed bulging in the rear of the container. Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 264.35] requires that the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment. And decontamination equipment to any area of facility operation in an emergency.

10.4. Container Storage Unit

The inspectors observed the permitted waste storage area. The storage area is organized by bay numbers which identify the type of waste that can be safely stored within the bay. The fire suppression system had not been properly maintained and updated at the time of the inspection. Therefore, the storage area was not permitted to store any flammable materials at the time of the inspection.

Row 301 (Figure 9) Inspectors observed the container labeled Spectrus NX114. The TEF1 label identified the container number as F17908-01-02 and indicated that the material was characteristically hazardous for ignitability. The MSDS was reviewed for the material. The MSDS indicates that the flash point of the material is >200 °F and that the material would meet the characteristic for corrosivity (D002) and not ignitability.

Container F18297-01-01 (Figure 10) had been characterized as a flammable hazardous waste and was stored in the container storage area.

Row 303 (Figures 11 and 12) Inspectors observed a 55-gallon drum stored in Row 303 which was under a negative pressure. The labels on the drum indicate that the drum was received at TEF1 on 6/30/2014 from Florida Atlantic University, FLD982150658, on manifest number 012355473JJK.

Inspectors observed three 5-gallon container of hazardous waste that shown signs of corrosion and deterioration. (Figures 13 and 14)

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions Condition 1 states “The Permittee shall comply with those sections of 40 C.F.R. § 124 specified in Subsection 62-730.200(3), F.A.C., 40 C.F.R. § 260 through 268, and 40 C.F.R. § 270 as adopted in Chapter 62-730, F.A.C., until all hazardous waste permitting operations have ceased and the facility has been closed and released from postclosure care requirements and all facility-wide corrective action requirements.” Pursuant to Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 264.171], which requires a facility to transfer hazardous waste from containers which are not in good condition, or have begun to leak into containers which are in good condition and manage the waste in accordance with the applicable regulations.

Inspectors observed the fire extinguisher, emergency shower and eye wash test/inspection record which indicated that the equipment had not been inspected since 6/20/2014 (Figure 15).

Pursuant to Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 264.15], which requires the owner or operator of a facility to inspect his facility for malfunctions and deterioration, operator errors, and discharges on a written schedule. Hazardous Waste Permit Number: 26916-HO-008 requires that inspections of emergency equipment be conducted weekly.

10.5. Waste Consolidation/Stabilization Area

Inspectors observed the waste Consolidation Area to contain five pallets of hazardous/universal pharmaceutical waste in black containers, one pallet of containers with blue lids that had two black hazardous waste containers on top of it (Figure 16), eleven super sacks, and two pallets of red biomedical waste containers. Many of the containers were not properly closed and the lack of aisle space did not allow unobstructed movement in the area.

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions Condition 1 states “The Permittee shall comply with those sections of 40 C.F.R. § 124 specified in Subsection 62-730.200(3), F.A.C., 40 C.F.R. § 260 through 268, and 40 C.F.R. § 270 as adopted in Chapter 62-730, F.A.C., until all hazardous waste permitting operations have ceased and the facility has been closed and released from postclosure care requirements and all facility-wide corrective action requirements.” Pursuant to Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 264.171], which requires a facility to transfer hazardous waste from containers which are not in good condition, or have begun to leak into containers which are in good condition and manage the waste in accordance with the applicable regulations.

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions Condition 11.d states “The Permittee shall maintain aisle space, as required pursuant to 40 C.F.R. 264.35, to allow the unobstructed movement of personnel, fire protection, and emergency response equipment to any area of the facility.” Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 264.35] requires that the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment. And decontamination equipment to any area of facility operation in an emergency.

Inspectors asked Mr. Vick about the consolidation processes that take place in the area. Mr. Vick explained that the facility’s standard operating procedure was to open the containers of hazardous/universal pharmaceutical waste and separate out the solid waste. The solid waste components including needles, IV lines, bags and tubing, paper towels, gloves, and other wastes that the generator had determined to be hazardous wastes. These wastes were removed from the black containers and combined in with solid waste or biomedical waste (Figures 17-24). Inspectors obtained a SOP for the separation/consolidation procedure.

The facility personnel do not appear to have sufficient knowledge of the use and potential contamination of the waste through a visual examination of the material to determine if the waste would meet the definition of hazardous waste, whether by characteristic or listing. Furthermore, the generator is responsible for making hazardous waste determinations at the point the waste is generated. The generator has already made the determination that the waste in the black containers is a hazardous waste and sent it for management and disposal, as such. The further reclassification of the waste and subsequent shipment of the reclassified waste as a non-hazardous solid waste, or biomedical waste without the required documentation to a facility that is not permitted to manage the waste is problematic. The universal pharmaceutical waste standards found at Fla. Admin. Code Ann. r. 62-730.186 require very specific criteria and management standards to be met in order to manage the waste as a universal pharmaceutical waste. TEFI does not appear to be meeting these criteria or management standards. Therefore, pursuant to Fla. Admin. Code Ann. r. 62-730.186(3) the hazardous waste pharmaceuticals not managed as universal waste in accordance with this section shall be managed in accordance with Chapter 62-730, Fla. Admin. Code, and shall be disposed of at a permitted hazardous waste treatment, storage or disposal facility.

Hazardous Waste Permit Number: 26916-HO-008 requires that “Consolidated waste is assigned the same codes that belonged to the waste put into the consolidated containers.” Pursuant to Fla. Admin. Code Ann. r. 62-730.186(5), a handler of universal pharmaceutical waste is prohibited from disposing of universal pharmaceutical waste.

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions Condition 2 states “The Permittee shall comply with the manifest requirements of 40 C.F.R. §§ 264.71 and 264.72. The Permittee must document the reconciliation of any manifest discrepancies.” Pursuant to Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 264.71] which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.20(a)(1)], a generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal must prepare a Manifest on EPA Form 8700-22.

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions Condition 2 states “The Permittee shall comply with the manifest requirements of 40 C.F.R. §§ 264.71 and 264.72. The Permittee must document the reconciliation of any manifest discrepancies.” Pursuant to Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 264.71] which incorporates Fla. Admin. Code Ann. r. 62-730.160(1)-.01(3)(a) [40 C.F.R. § 262.12(c)] and Fla. Admin. Code Ann. r. 62-730.160(1)-.01(3)(a) [40 C.F.R. § 262.20(b)], a generator must not offer his hazardous waste to transporters or to treatment, storage, or disposal facilities that have not received an EPA identification number and that the generator must designate on the manifest one facility which is permitted to handle the waste.

At the time of the inspection the inspectors observed a 30-cubic yard roll off container in the Waste Consolidation/Stabilization Area. At the time of the inspection the tarp covering the roll-off container was not secure. The container was labeled “Hazardous Waste.” The label indicated that the container held sand blast media that was characteristically hazardous waste due to the lead content. However, the description of the waste appearing on the labels was improperly or inconsistently completed. Inspectors observed what appeared to be spilled material on area around the container (Figures 25-27).

10.6. Exterior

Inspectors observed a 30-cubic yard roll off container in the rear of the Consolidation and Stabilization Area. This container held contained crushed 5-gallon cans, punctured aerosol cans, empty 1-gallon cans, drum lids, and aluminum frames from totes. (Figure 28)

Inspectors observed another five roll-off containers staged on the east side of the building in the dirt lot. Several of these containers held standing liquid that appeared to have been allowed to accumulate over time. No mosquito larva were observed in the liquid in any of the containers. This appeared to be unusual for standing rain water in July in Florida. In one of the containers plant life was observed but not in the others. (Figures 29-32) Inspectors asked the Mr. Vick about the containers there current and previous contents and if any mosquito prevention had been utilized. Mr. Vick speculated that the containers held rainwater.

Inspectors observed the storm water drain on the north-west corner of the fenced facility area. The drain was surrounded by a small berm approximately 2" high and 6" wide which contained PVC piping with shut-off valves. At the time of the inspection valves were observed in the open position. Standing water was observed on the south side of the berm. (Figure 33) This water contained tad polls, mosquito larva and vegetative growth.

10.7. Records Review

At the time of the inspection a limited review of the uniform hazardous waste manifests, weekly inspections, employee training, biennial reporting, and Contingency Plan was conducted.

Review of the Contingency Plan found the primary contact, Thomas Montgomery, who was no longer employed by TEF1. The secondary contact, Lee Richardson, was also unavailable at the time of the inspection. However, Nicholas Vick was designated as an alternate contact. Mr. Vick was available during the inspection however he was not thoroughly familiar with all aspects of the facility's operations and activities. Additional information has been requested.

Hazardous Waste Permit Number: 26916-HO-008 Part II – Operating Conditions, Subpart A – General Operation Conditions Condition 1 states "The Permittee shall comply with those sections of 40 C.F.R. § 124 specified in Subsection 62-730.200(3), F.A.C., 40 C.F.R. § 260 through 268, and 40 C.F.R. § 270 as adopted in Chapter 62-730, F.A.C., until all hazardous waste permitting operations have ceased and the facility has been closed and released from postclosure care requirements and all facility-wide corrective action requirements." Pursuant to Fla. Admin. Code Ann. r. 62-730.171(4)(a) [40 C.F.R. § 265.52(d)], which requires that the facility's Contingency Plan list the names, addresses, and phone numbers (cellular and home) of all persons qualified to act as emergency coordinator, and that this list must be kept up to date.

Additional information relating to uniform hazardous waste manifests, waste profiles, land disposal restrictions, employee training, weekly inspections, and the facility Contingency Plan has been requested.

10.8. Closing Conference

A Closing Conference was held on July 15, 2014 by teleconference. During the teleconference the preliminary findings of the inspections were discussed.

11. **Signed**



Brooke York
Environmental Engineer
Hazardous Waste Enforcement and Compliance Section
Enforcement & Compliance Branch,
Resource Conservation and Restoration Division

1/15/2015
Date

12. **Concurrence**



Larry Lamberth
Chief, Hazardous Waste Enforcement and Compliance Section
Enforcement & Compliance Branch,
Resource Conservation and Restoration Division

1/28/14
Date

Attachment 1
Photographs taken July 14, 2014

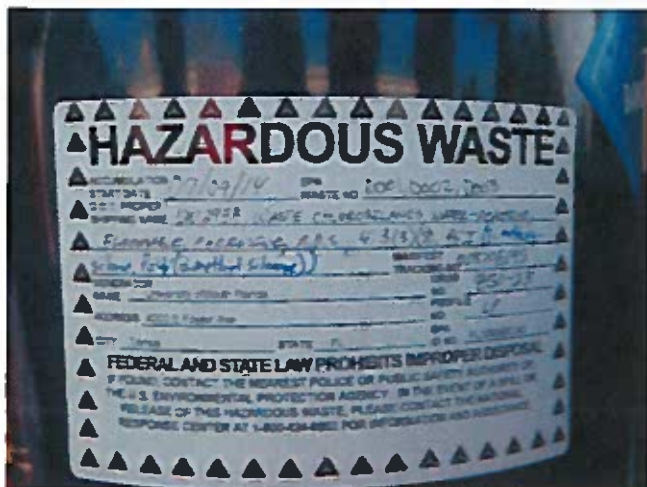


Figure 1: 850-23



Figure 2: The asphalt surrounding the dumpster.



Figure 3: Waste in rear of AES Trailer.

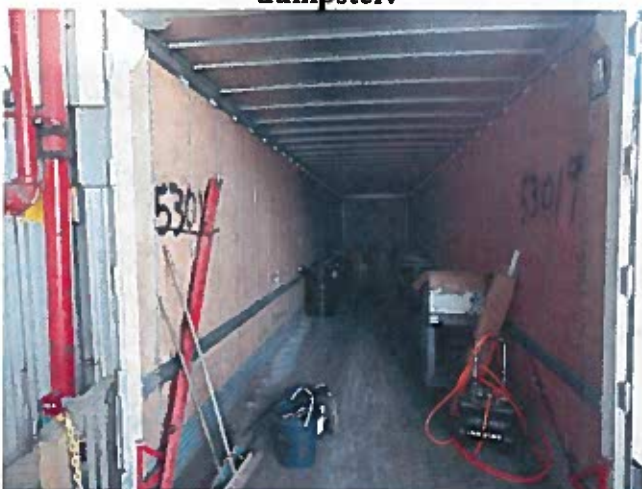


Figure 4: Overview of Transfer Facility waste storage on AES Trailer.



Figure 5: F18266-01-19 Nonhazardous label on top of hazardous label.



Figure 6: F18266-01-18 Nonhazardous label on top of hazardous label.



Figure 7: F18266-01-08



Figure 8: F18266-01 Nonhazardous label on top of hazardous label.

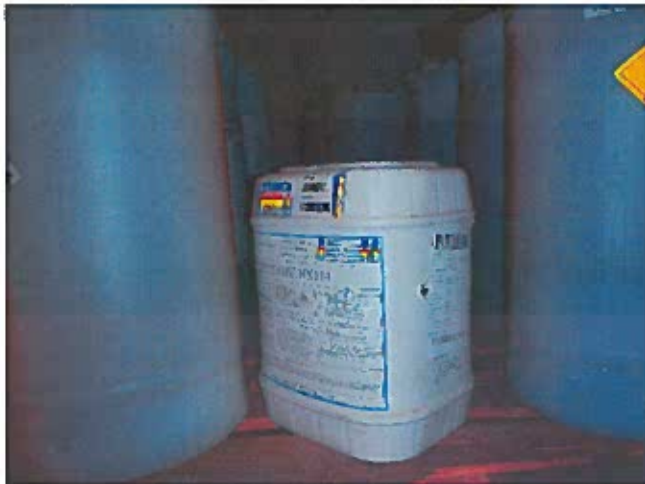


Figure 9: Container labeled Spectrus NX114



Figure 10: F18297-01-01 which had been characterized as D001 waste.



Figure 11: Container under negative pressure.



Figure 12



Figure 13: Condition of containers.



Figure 14: Condition of container.



Figure 15: Inspection tag on fire extinguisher.



Figure 16: Aisle space in Consolidation Area.



Figure 17: Waste in Consolidation Area.

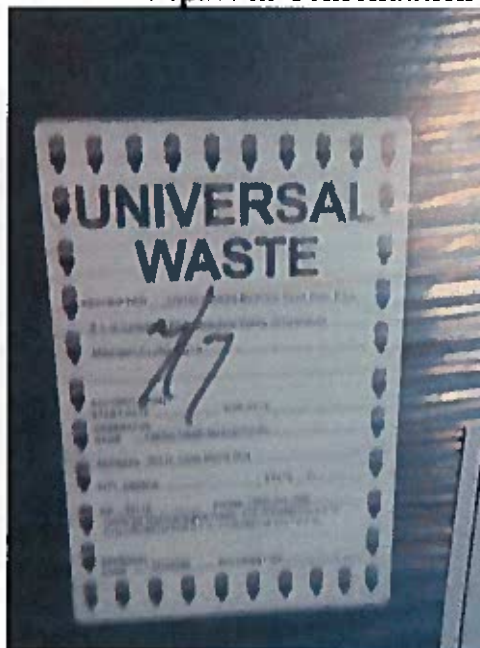


Figure 18:



Figure 19: Waste in Consolidation Area.



Figure 20: Waste in Consolidation Area.



Figure 21: Open container of waste in Consolidation Area.



Figure 22: Waste in Consolidation Area.



Figure 23: Waste in Consolidation Area.

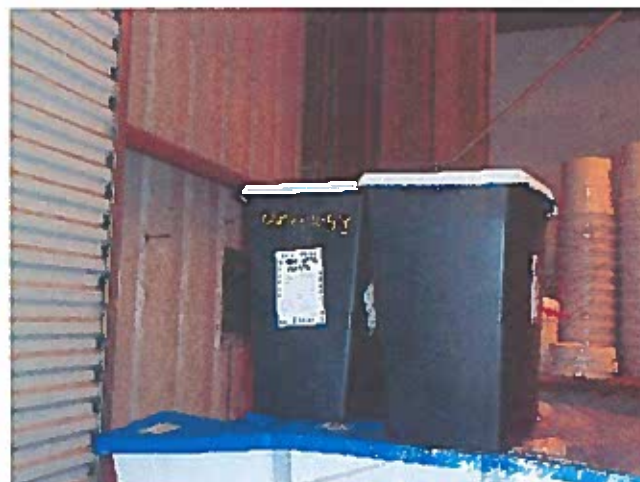


Figure 24: Oncology waste in Consolidation Area.



Figure 25: Waste in Stabilization Area.



Figure 26: Open container of waste in Stabilization Area.

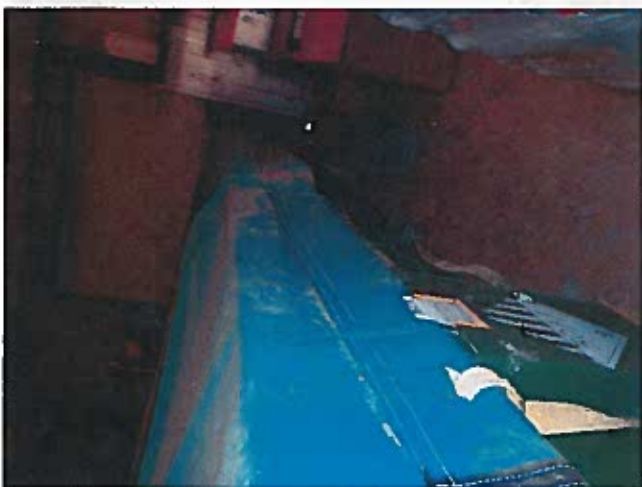


Figure 27: Open container of waste in Stabilization Area.



Figure 28: Roll off



Figure 29



Figure 30

Attachment 1



Figure 31



Figure 32



Figure 33



Figure 34: Overview of Loading Dock



Figure 35: 850-27



Figure 36: 850-28



Figure 37: Nonhazardous label over a different label.



Figure 38: Nut and bolt closure on drum ring.



Figure 39: Truck next to AES Trailer.

