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west virginia department of environmental protection

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DWWM-EE/Hazardous Waste  
76 Conservation Way  
Parkersburg, WV 26104  
Phone: 304-420-4635

Harold D. Ward, Cabinet Secretary  
dep.wv.gov

## COMPLIANCE SCHEDULE EVALUATION

**RE:** Peoples Cartage, Inc.

**EPA ID:** WVR000507657

**Date/Time Inspected:**

March 19, 2026 at 10:00 am

**Facility Representative(s):**

John Davis, Sr. Operations Manager  
Gregg Frazier, Vice President

**Inspected By:**

Chad Longanacre, WVDEP-EE/HW  
Matthew Smith, WVDEP-EE/HW  
John Killian, WVDEP-EE/HW

**Prepared By:**

Chad Longanacre, Environmental Inspector

On arrival, we met with Gregg Frazier, presented credentials, and explained the purpose of the inspection. Mr. Frazier accompanied us during this inspection. This Compliance Schedule Evaluation was conducted to verify compliance with the enforceable compliance schedule associated with Consent Order number HW-25-005. The Plan of Corrective Action (POCA), was approved by the agency on December 15, 2025. Notice of Violation #2506-586 was issued June 5, 2025 detailing two outstanding violations, 40 CFR 262.16(b)(8)(i) and WVSC 22-18-8(a).

### Facility Information:

Peoples Cartage, Inc. is a miscellaneous manufacturing, contract packaging, and warehousing facility located at 221 Airport Industrial Park, Parkersburg, WV. The facility last submitted notification as a Small Quantity Generator (SQG) of Hazardous Waste (HW) certified on November 21, 2025. However, the facility submitted a Biennial Report for the 2025 cycle, claiming Large Quantity Generator (LQG) status with a certification date of February 26, 2026.

At this time, the facility engages in the sorting, transloading, packaging, and warehousing of granular Calcium Hypochlorite, ACL® 60 Chlorinating Composition, and Dantobrom™ TBS-5B, each of which are oxidizers and a D001 ignitable HW when discarded. The ACL 60 Chlorinating Composition, Sodium dichloro-s-trianzinetriene, (Sodium Dichlor) generates a waste that the facility has shipped as HW with no waste codes indicated (**Attachment A**). Sodium Dichlor is an oxidizer, requiring the waste code D001 to be reported on the Manifest. The facility failed to appropriately prepare a hazardous waste manifest, a violation of **40 CFR 262.20**. The facility also generates waste from repackaging Dantobrom TBS-5B, referred to as Bromo, which is characterized by the facility as a D001 and D002 HW. During review of the recently submitted Biennial report, the only hazardous waste observed to be reported is

calcium hypochlorite; consequently, the facility has failed to report two wastes on its biennial report, a violation of **40 CFR 262.41(a)**.

Manifest and Biennial Report:

During a review of manifests submitted to the RCRAInfo online database, the facility's last shipment was observed to be on 01/29/2026. A review 180 days prior to this last shipment, which was 09/02/2025, showed 40,800 lbs of hazardous waste (HW) was shipped off-site. During this time the facility generated >2,200 pounds of HW in a month, which firmly meets LQG amounts prior to any notification change to the facility's generator category, a violation of **40 CFR 262.13**.

Observations:

The facility has implemented a program where the generated floor sweepings are placed in plastic buckets and checked with a forward-looking infrared thermal (FLIR) camera over the course of 30 minutes to ensure no exothermic reactions have begun to occur within the storage containers. The facility has also initiated plans to add a neutralizing process to any generated waste, which involves filtering out solids for landfill disposal and sending the resulting liquid to a Publicly Owned Treatment Works (POTW). Planning for this treatment activity is ongoing and is expected to be implemented in June 2026. These measures rectify the violations observed during the June 5, 2025 Focused Compliance Inspection (FCI).

During the inspection, the current management of HW on-site was observed. We noted three main storage areas, which are poured reinforced concrete outbuildings equipped with ventilation, smoke detection, and alarm systems. In the SW-3 storage area, approximately 118 plastic containers were observed, primarily 50-lb or 25-lb buckets, with the majority being the larger size. Not all containers in the SW-3 Area were labeled with the words "Hazardous Waste," and not all containers were labeled with the accumulation start date, these are violations of **40 CFR 262.17(a)(5)(i)(A) and 40 CFR 262.17(a)(5)(i)(C)** respectively. In the SW-1 Area, 27 containers of HW were observed, which also lacked the accumulation start date on all containers; this is a violation of **40 CFR 262.17(a)(5)(i)(C)**. In the SW-2 Area, 34 containers of HW were observed that were not marked with the accumulation start date or an indication of the hazards contained within, these are violations of **40 CFR 262.17(a)(5)(i)(C) and 40 CFR 262.17(a)(5)(i)(B)** respectively.

During this inspection, the SW-1 and SW- 2 Accumulation Areas were observed with moisture collecting on the floor of the building. The storage of oxidizing and reactive materials should be in a cool and dry area, without the pooling or presence of water runoff. This is an **Area of Concern**.

Following the inspection, on March 19 at 2:53 pm, Mr. Gregg Frazier provided this inspector with photographs detailing the correction of labeling on the containers observed during the inspection. This prompt response to observations of labeling violations of the container management regulations in 40 CFR 262.17, has abated those violations.

Compliance Evaluation:

The following violations of the applicable regulations were noted during this inspection:

1. The facility failed to appropriately notify for their actual generator category.  
**Reference: 40 CFR 262.13.**
2. The facility has failed to report two hazardous wastes on its most recent biennial report.  
**Reference: 40 CFR 262.41(a).**

Area of Concern:

1. Inspectors observed the presence of moisture within the storage area of a Hazardous Waste oxidizer.



# **ATTACHMENT A**

**Manifest tracking number 009681197SKS**



Please print or type.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number WVR000507657	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number <b>009681197 SKS</b>
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5. Generator's Name and Mailing Address  
**REO Processing**  
**221 Industrial Park Road**  
**PARKERSBURG WV 26104-0000**  
 Generator's Phone: **937-545-8521**

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name  
**SAFETY-KLEEN SYSTEMS INC**

U.S. EPA ID Number  
**TXR000081205**

7. Transporter 2 Company Name  
**Clean harbors ENV SERVICES INC**

U.S. EPA ID Number  
**MADD39322250**

8. Designated Facility Name and Site Address  
**CLEAN HARBORS EL DORADO, LLC**  
**309 AMERICAN CIRCLE**  
**EL DORADO, AR 71730**  
 Facility's Phone: **870-863-7173**

U.S. EPA ID Number  
**ARD069748192**

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN3085, WASTE OXIDIZING SOLID, CORROSIVE, N.O.S., (BROMO-CHLORO-DIMETHYLHYDANTOIN), 5.1, (8), PG III	90	DF	7200	P	D001	D002	
X	2. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., (SODIUM DICHLORO-S-TRIAZINETRIONE), 9, PG III	24	DF	1800	P	NONE		
	3.							
	4.							

14. Special Handling Instructions and Additional Information  
**TSD:EL RE31312 CS6:**  
 1) ERG#140; 2) ERG#171;  
 24H ~~initial transporter to add or substitute additional transporters on generator's behalf.~~  
 CH/SK/TFI-Contract retained by generator confers agency authority

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: **Michelle Hill** Signature: *[Signature]* Month: **9** Day: **5** Year: **02**

16. International Shipments  Import to U.S.  Export from U.S. Port of entry/exit: \_\_\_\_\_ Date leaving U.S.: \_\_\_\_\_

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: **James Hill** Signature: *[Signature]* Month: **9** Day: **5** Year: **02**

Transporter 2 Printed/Typed Name: **Grant Schuchman** Signature: *[Signature]* Month: **9** Day: **11** Year: **05**

18. Discrepancy  Quantity  Type  Residue  Partial Rejection  Full Rejection

Manifest Reference Number: \_\_\_\_\_

18b. Alternate Facility (or Generator) U.S. EPA ID Number: \_\_\_\_\_

Facility's Phone: \_\_\_\_\_

18c. Signature of Alternate Facility (or Generator) Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. **H040** 2. **H040** 3. \_\_\_\_\_ 4. \_\_\_\_\_

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: **Brittany Macher** Signature: *[Signature]* Month: **10** Day: **11** Year: **05**

PLANT: PSD

LDR/NOTIFICATION FORM

08:30:25

GENERATOR NAME: RED Processing

MANIFEST NO.: 009681197

OR SALES SERVICE NO.:

CUST#: RE31312

SK Shipping #: 246566416

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO: 1 MANIFEST PAGE/LINE# 01/001 SKPRFL NO: 2934747

SKDOT#: 10226709

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):

D001 ICW

IGNITABLE CHARACTERISTIC WASTE

D002 CCW

CORROSIVE CHARACTERISTIC WASTES

Treatability group: NNW Non-Waste Water

Waste Constituent Notification: None

LDR FORM LINE NO: 2 MANIFEST PAGE/LINE# 01/002 SKPRFL NO: 3201980

SKDOT#: 10311798

*Cecilia Schuchman*

*Ernest Schuchman*

9 11 25

NOTES

*Michelle M/G*

*Michelle M/G*

9, 5, 25

GENERATOR'S AUTHORIZED SIGNATURE

NAME & TITLE (PRINTED OR TYPED)

DATE

PLANT: PSD

CSG: REF#:

SW:

TOP COPY: GENERATOR

MIDDLE COPY: FACILITY

BOTTOM COPY: TRANSFER