

EPA ID # 471007460 FID # 471007460 BRRTS # 02-71-110797	Case Title Donaldson's One Hour Cleaners
Activity Site Inspection	Date of Activity October 18, 2021

On Monday, October 18, 2021, at approximately 8:50 hours, Waste Management Specialist Alexander Beyer (Beyer), arrived at the former Donaldson's One Hour Cleaners located at 110 W. Cecil St., Neenah, WI of Winnebago County to meet with Brett Donaldson (Donaldson) as agreed during their October 5, 2021 phone conversation. Hydrogeologist Gwen Saliaries (Saliaries) arrived shortly thereafter.

Beyer and Saliaries met with Donaldson to inspect and discuss the nine drums of spent drycleaner filters that were being stored in a trailer on the site. Donaldson allowed Beyer and Saliaries to enter the trailer and take photos of the drums (attached).

Beyer asked Donaldson about the plans for disposal of the drums. Donaldson stated that he was in the process of filing for personal bankruptcy and did not have the funds to pay for disposal but hoped to have the issue resolved by the end of the year. Beyer and Donaldson discussed some of the hazardous waste disposal companies in the area and Beyer agreed to provide Donaldson with a list of facilities that could accept the waste. Beyer asked if Donaldson would mind if Beyer could email him in a month for a status check. Donaldson said that would be fine and that he would 'need some babysitting' to keep him on pace.

Beyer observed there were nine drums on three pallets in the trailer. Beyer did not observe any labels or markings on the drums. Beyer explained to Donaldson that the drums needed to be marked "Hazardous Waste" and marked with an indication of the hazards, such as 'toxic solid'. Beyer explained that the marking could be a label or marked directly on the drums with a paint pen or marker. Donaldson inquired if there was a specific place the marking needed to be as some of the drums were shrink wrapped on the pallets. Beyer said that marking the top of the drums would be acceptable. Beyer noted the interior of the trailer contained various desks and other furniture, overall the trailer appeared in good condition without signs of leaks or holes and the drums appeared to be in decent condition. Beyer asked if the trailer was kept locked, Donaldson replied it was. Beyer urged Donaldson to ensure the trailer was kept locked to prevent anyone from tampering with the drums and to promptly mark the drums to ensure if emergency responders needed to access the trailer they would be informed of the content of the drums. Beyer requested that when Donaldson mark the drums that photos be provided to Beyer to confirm they were now marked.

Beyer inquired about when the drums were generated. Donaldson initially responded that he was uncertain, after thinking for some moments Donaldson replied between 2015 and 2020 when they were taken to Appleton. Beyer inquired if the drums were gradually filled over that time as filters needed to be replaced, Donaldson stated that was the case.

Beyer inquired if Donaldson knew how much each drum weighed, Donaldson did not know. Beyer then pushed one of the drums and noted that it felt heavy and estimated the drum weighed between 300 and 400 pounds, Donaldson agreed that that weight sounded accurate. Beyer explained that it appeared there was in excess of 2,200 pounds of waste and that Donaldson would be considered a Small Quantity Generator that could only accumulate waste for 180 days.

Beyer and Saliars thanked Donaldson for his time and left the site at approximately 9:10 hours.



Regulator Reporting Alexander Beyer	Date of Report October 18, 2021	Exhibit Reference
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Photo #:	001
Date/Time of Photo:	10/18/2021
Photo Location:	110 W Cecil St, Neenah WI
Photo By:	Gwen Saliaries
Photo Description:	Interior of semi-trailer, looking southeast at the 55-gallon drums. Eight drums pictured here, nine drums in total. Showing tops of drums.



Photo #:	002
Date/Time of Photo:	10/18/2021
Photo Location:	110 W Cecil St, Neenah WI
Photo By:	Gwen Saliaries
Photo Description:	Interior of semi-trailer, looking southeast at the 55-gallon drums. Eight drums picture here, nine drums in total. Showing tops of drums and the eight drums shrink wrapped in two groups of four.



Photo #:	003
Date/Time of Photo:	10/18/2021
Photo Location:	110 W Cecil St, Neenah WI
Photo By:	Gwen Saliaries
Photo Description:	Interior of semi-trailer, looking east at the 55-gallon drums. All nine drums pictured here. Showing tops of drums and shrink wrapped sides.



Photo #:	004
Date/Time of Photo:	10/18/2021
Photo Location:	110 W Cecil St, Neenah WI
Photo By:	Gwen Saliaries
Photo Description:	Interior of semi-trailer, looking east at the 55-gallon drums. All nine drums pictured here. Showing tops of drums and shrink wrapped sides, and the pallets the drums were resting on.



Photo #:	005
Date/Time of Photo:	10/18/2021
Photo Location:	110 W Cecil St, Neenah WI
Photo By:	Gwen Saliaries
Photo Description:	Outside of semi-trailer, looking southwest at the condition of the trailer and surrounding landscape. Three 55-gallon drums visible through open door of semi-trailer.

From: Beyer, Alexander W - DNR
Sent: Monday, October 18, 2021 1:02 PM
To: bdonaldson@donaldsonscleaners.com
Cc: Saliars, Gwen N - DNR
Subject: DNR Meeting Follow-up

Follow Up Flag: Follow up
Flag Status: Completed

Brett,

Thank you for taking the time this morning to meet with Gwen and myself. As we discussed this morning I am providing some additional information to assist with the storage and disposal of the nine drums of spent filters.

Here is a list of licensed facilities in Wisconsin and some transporters that may be able to accept the material that service this part of the state. Let me know if you have any issues getting in contact with these facilities, I don't have phone numbers for sales side of these businesses but I can reach out and get those if they aren't easily found on-line.

WRR ENVIRONMENTAL SERVICES CO INC	5200 Ryder Rd	Eau Claire	WI
WM WASTE INC	21211 Durand Ave	Union Grove	WI
BRENNTAG GREAT LAKES LLC-RECLAIM	N59W14898 Bobolink Ave	Menomonee Falls	WI
Veolia ES Technical Solutions, LLC	W124 N9451 Boundary Rd.	Menomonee Falls	WI
SAFETY-KLEEN SYSTEMS INC	2200 S West Ave	Waukesha	WI
Tradebe Treatment and Recycling of WI LLC	5611 W Hemlock St	Milwaukee	WI
HYDRITE CHEMICAL CO	114 N Main St	Cottage Grove	WI
VEOLIA ES TECHNICAL SOLUTIONS LLC	1275 Mineral Springs Dr	Port Washington	WI
SAFETY-KLEEN SYSTEMS INC	2100 Badger Rd	Kaukauna	WI
Covanta	210 Tower Road	Winneconne	WI
Enviro-Safe	W130N10500 Washington Dr	Germantown	WI
LRI (formerly Lamp Recyclers)	2955 Ramada Way	Green Bay	WI
OSI Environmental	2253 Progress Way	Kaukauna	WI
Wausau Chemical Corp.	2001 N. River Dr	Wausau	WI
Univar USA Inc.	845 Terrace Ct.	Saint Paul	MN

Regarding the storage of the drums on the trailer. Hazardous waste containers need to be marked with the words "Hazardous Waste" and marked with an indication of the hazardous. As discussed this morning, marking the drums "Toxic Solids" would be acceptable indication of the hazards. The marking can either be with labels, or with the words clearly written on the drums with marker or paint pen. Once you have marked the drums please provide a photo(s) so I can document that has been resolved.

Regarding the generation and transportation of the drums. If you can, please provide additional information regarding:

- 1) The drums were generated between 2015 and 2020, over time as the filters needed changing. Please let me know if this is incorrect.
- 2) Dates or approximate dates the drums were moved from the Cecil Street location to Appleton, and when the drums returned back to Cecil Street.
- 3) I believe you mentioned that the drums were moved to the property on Edgewood Drive in Appleton, however I forgot to put that in my notes and want to confirm that was the location.
- 4) Ownership of the trailer. Please confirm if you are the owner of the trailer, or if another transporter was used to move the drums.

Please feel free to reach out if you have any questions or if there is any assistance I can provide.
Regards,

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Alexander Beyer

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