

# LIQUID RECYCLING

ENFINITE MID-YEAR MEETING

# WINDY CITY

Chicago | June 18-20, 2025

See Page 16



**Featured:**

PFAS Update .....22  
Hazardous & Specialty  
Waste Council .....26

**Also in this Issue:**

Digital Technologies .....8  
Member Spotlight: Pacific Resource Recovery .... 12  
2025 ENFINITE Conference & Trade Show .....28  
Planning for an OSHA Inspection .....30





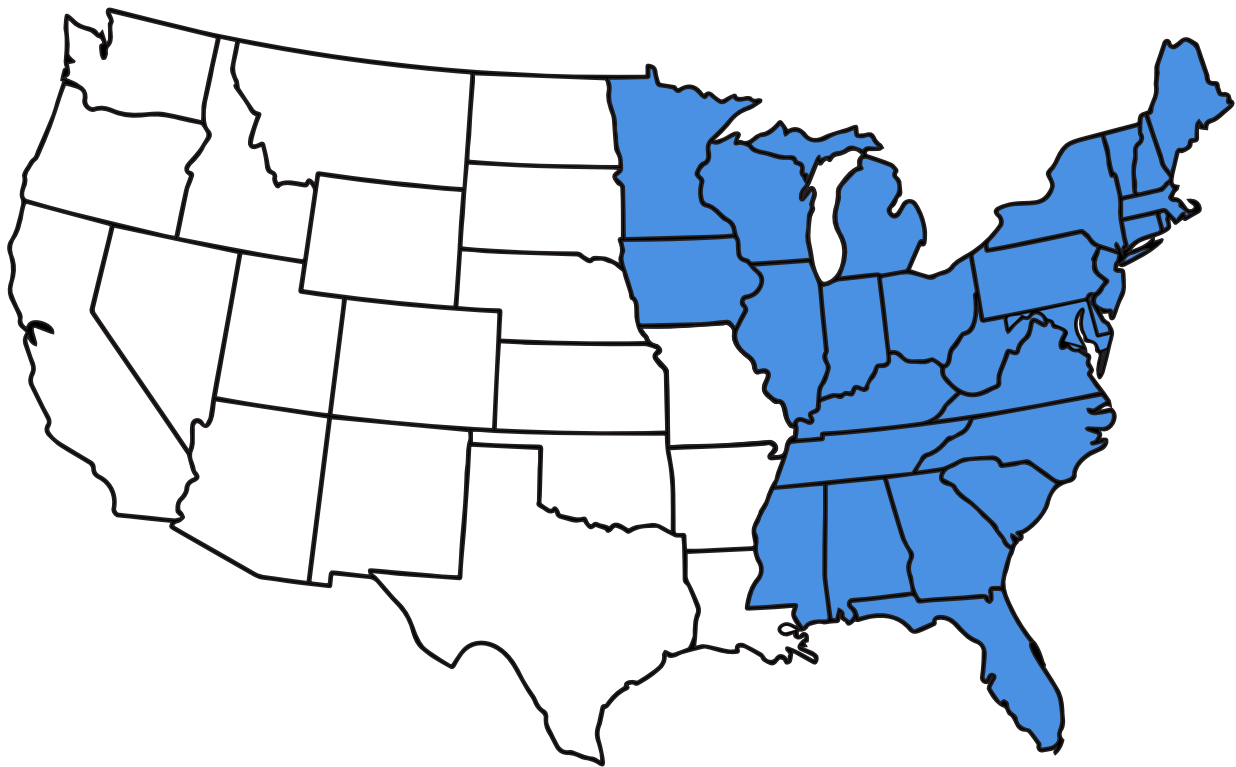
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# PARKER'S POINT

by Scott D. Parker, ENFINITE Executive Director

## Bigger Tent

The association's rebrand to ENFINITE: The Industrial Liquid Recyclers Association is more than an attractive new logo and name that encompasses the wide service offerings of its members.

We are revamping how we promote to the general public the essential environmental services our members provide.

We are updating our information on how we attract and secure new members.

We are reimagining how members can interact and network with each other not just during ENFINITE events, but throughout the year.

And we are adding new elements and councils to ensure ENFINITE represents the wide variety of environmental services provided by members.

## Environmental Services

The association started in 1984 representing and protecting used oil recyclers. Over time, the association became a 'big tent' organization for members that collected and processed a wider variety of industrial liquids including wastewater, antifreeze, solvents and more.

Now the 'big tent' is getting bigger. Our members have become increasingly involved in collecting and/or managing

hazardous and specialty waste. To support members involved in that space, the Board of Directors has approved creating a new Hazardous & Specialty Waste Management Council. It will have its first formal gathering at the upcoming ENFINITE Mid-Year Meeting. See page 16.

## Industrial Services

During the research for the rebrand, it was discovered that 70% of members provide various industrial services outside of their traditional environmental service offerings. Many of the industrial services generate industrial liquids that need to be treated.

Last year, ENFINITE created an Industrial Services Council, and it will be meeting in Chicago as well.

The Industrial Services Council met recently to add categories for member profiles in the 2025 Membership Directory. The initial list of Industrial Services categories is: Confined Space, Emergency Response, Hydro Excavation, Hydroblasting/Industrial Cleaning, In Plant Services, Lab Packs, PFAS Remediation, Rail Car/Marine, Spill Plans/Safety Training, Tank Cleaning, Vac Truck Services and Water Jetting.

Members should closely review their Membership Directory Update Packets that are being sent and add the industrial services they provide. This will assist fellow members in finding you for business opportunities.

# TABLE OF CONTENTS

Parker's Point .....	3
Welcome To ENFINITE's Newest Members ..	5
Industry Calendar .....	5
Industry News .....	6
Digital Technologies .....	8
Member Spotlight: Pacific Resource	
Recovery.....	12
Mid-Year Meeting Info.....	16
PFAS: A Regulatory Tug-Of-War .....	22
Hazardous & Specialty Waste Council.....	26
2025 Conference & Trade Show .....	28
Planning for an OSHA Inspection .....	30
Supplier/Vendor Directory .....	34

## ADVERTISER INDEX

Advantage Route.....	21
ANOVA.....	7
Blue Tide Environmental.....	Inside Back Cover
Buck's Oil Company.....	35
Crystal Clean, LLC.....	45
Dexsil Corporation .....	Back Cover
EcoLube Recovery LLC.....	6
EHS Momentum .....	36
Engine & Accessory, Inc. ....	37
Gallagher.....	31
GFL Environmental Inc.....	49
Helix Laboratories, Inc .....	29
InCon Process Systems .....	40
Liberty Mutual Environmental .....	42
Loyal Standard .....	44

Midwest Gas .....	Inside Cover
Oilmen's Truck Tanks Inc. ....	53
OSCAL. AI.....	51
Otodata .....	47
PESCO - Pragmatic Environmental Solutions Company .....	41
Radian Chemicals LLC .....	46
ReGen III Corp.....	27
Summit Environmental Technologies .....	47
Turn-Key Environmental .....	38
Valicor Environmental Services, LLC .....	4
Vertex Energy Inc.....	43
Wastelinq.....	39
World Oil Corp.....	54
XL Insurance, Division of AXA.....	25

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Environmental Services

# NEW MEMBERS

## Liquid Controls

Oklahoma City, Oklahoma  
(513) 335-8073  
www.lcmeter.com

## MKP Mobility Limited

Pune, Maharashtra  
(91) 9822022706  
www.mkpmobility.com

## VanGold Industries

Memphis, Tennessee  
(901) 606-5672  
www.vangoldindustries.com

## DESMI

Chesapeake, Virginia  
(757) 334-6962  
www.desmi.com

Know someone who should be an ENFINITE member? Contact [nick@enfinite.org](mailto:nick@enfinite.org) or call **703-753-4277**.

# INDUSTRY CALENDAR

## TCEQ 2025

June 3-4, 2025  
Henry B. Gonzalez Convention Center  
San Antonio, TX  
Visit ENFINITE at booth # 620

## 2025 ENFINITE Mid-Year Meeting

June 18-20, 2025  
Intercontinental Chicago, Magnificent Mile  
Chicago, IL

## NAPA 2025 Mid Year Meeting

July 8-11, 2025  
Louisville, KY

## 2025 ILMA Annual Meeting

October 4-7, 2025  
Boca Raton, FL

## International Day at ENFINITE 2025

November 12, 2025  
JW Marriott Miami Turnberry  
Resort & Spa  
Aventura, FL

## 2025 ENFINITE Conference and Trade Show

November 12-15, 2025  
JW Marriott Miami Turnberry  
Resort & Spa  
Aventura, FL

# INDUSTRY NEWS

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More information about these news items is available at [www.noranews.org/news](http://www.noranews.org/news).  
Send any industry news updates to [samantha@enfinite.org](mailto:samantha@enfinite.org).

## **Valicor Environmental Services Acquires Affordable Waste Management**

On April 2, 2025, Valicor announced the acquisition of Affordable Waster Management, Inc., the Louisville-area wastewater and sludge-hauling operations of Grasslands Environmental Services.

## **VLS Environmental Solutions Acquires Samex Environmental**

VLS Environmental Solutions has acquired Samex Environmental, a San Diego-based provider of hazardous waste fuel blending and recycling services, strengthening its West Coast operations.

## **EPA to Revise Wastewater Regulations on Oil/Gas Extraction Discharges**

The U.S. Environmental Protection Agency (EPA) announced on March 12, 2025, that it will revise regulations on wastewater discharges for oil and gas extraction facilities. This action is included in a broader range of deregulatory actions that the EPA announced on March 12. The EPA stated that the review of regulations will include evaluating “modern technologies and management strategies to provide regulatory flexibility for oil and gas wastewater.”

## **Blue Tide Environmental Completes Baytown Facility**

Blue Tide Environmental announced in early April that their Baytown, Texas (UMO) re-refinery is now fully operational. This facility can process up to 5,000 barrels a day and features a hydrotreater that enables the production of Group II+ base oils with enhanced purity and significantly lower emissions.

## **Reworld Acquires R.E.D. Technologies and REDTECH Rail**

In March, Reworld announced the acquisition of R.E.D. Technologies, LLC (“REDTECH”), a privately held profiled waste and field remediation company located in Portland, Connecticut.

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# EcoLube

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North America generates approximately 1 billion gallons of used oil annually from industries such as new car dealerships, automotive services, commercial fleet operations, and manufacturers.

## TRANSFORM WASTE FLUID COLLECTION WITH TANK MONITORING

By deploying Anova's xFluid Tank Monitoring Solution, ECO-MAXX was able to eliminate annual tank overfills entirely, reduce service, and increase volume per service.



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2023 IoT Analytics Platform of the Year  
2022 IIoT Innovator of the Year



GLOBAL TECHNOLOGY CONFERENCE  
2022 Operations & Distribution Category Winner  
2021 Business Improvement Category Winner



# Digital Technologies Revolutionize Liquid Recycling Efficiencies

M. DIANE MCCORMICK

**D**igital technologies are taking efficiency to new heights. Liquid recyclers that leverage the power of automation and data analytics are leading the pack in profitability, competitive advantage, customer service and employee satisfaction.

The growing list of digital technologies includes these tools that are transforming liquid recycling:

**AI-powered advanced collection optimization:** Dispatching trucks based on real-time demand, rather than static schedules, increases material retrieval rates while reducing idle time and fuel costs. AI optimizes scheduling by analyzing collection demand, predicting optimal pickup time and dynamically adjusting operations.

**Tank monitoring and dashboards:** Real-time visibility into tank levels and conditions can eliminate overfills and runouts, reduce service frequency and upsize the gallons collected or dropped with each stop. Worry-free customers are confident that their tanks are being managed, and user-friendly dashboards and apps provide transparency that builds trust.

**EHS management:** Environmental Health and Safety software streamlines manual systems, for accountability and enhanced compliance. User-friendly interfaces provide acces-

sibility for all staff, for improved communications and heightened employee engagement.

**Waste management:** Cloud-based software connects generators, transporters and disposal facilities to simplify profiling, automate routing and streamline compliance documentation. The results? Reduced profiling time, fewer billing errors and optimized loads.

**Delivery and equipment service:** Software that manages and integrates the jobs unique to liquid recycling – everything from oil and antifreeze pickup to drum exchange and vacuum services – can optimize logistics, automate workflows, accelerate invoicing and compliance reporting and enhance data visibility.

The following is a list of members who provide one or more of the digital technologies listed above.

If you or another company you know offers digital technologies similar to those previously mentioned, please contact Scott Parker at [sparker@enfinite.org](mailto:sparker@enfinite.org). ■

# ENFINITE DIGITAL TECHNOLOGY MEMBERS

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Advantage Route, Inc. provides delivery and equipment service software designed for the liquid recycling industry, including oil and antifreeze pickup, drum exchange, parts washers, and vacuum services. Our software enhances operations by enabling:

Automated Route Optimization & Dispatch – Generate service tickets with customer-specific pricing and optimize driver routes.

Real-Time Tracking & Compliance – Ensure seamless service tracking with live updates between mobile apps and office software.

Inventory Monitoring & Integration – Track inventory in trucks and storage yards or integrate with remote tank monitoring.

Mobile App for Field Technicians – Drivers can record pickups, generate real-time service confirmations, and sync data instantly.

Seamless Accounting Integration – Works with QuickBooks and other accounting systems to automate invoicing, reduce administrative workload, and go paperless.



Anova is a global leader in industrial tank monitoring solutions, offering near real-time inventory monitoring and analytics to optimize logistics, supply chains, and industrial operations – worldwide. The Anova tank-monitoring solution includes a waste-oil tank monitor, a wireless cellular network connection, and a data and analytics dashboard that generates Key Service Indicators such as “Inventory Gallons”, “Percent Full”, and “Gallons Collected Last Visit”. The solution also provides predictive analytics, such as average “Daily Fill” (ADF) and “Days to Full” (DTF), which are easily filtered across a service area to help in service planning and resource optimization.



The DESMI ROTAN internal gear pump retains the DNA principles of the original designs, while incorporating a second-generation development that includes a range of proven, maintenance-friendly features.



We offer MyMomentum, a cloud-based Environmental Health and Safety (EHS) management software platform, and comprehensive EHS consulting services.

MyMomentum: This mobile platform automates EHS program administration, facilitating incident reporting, training management, QR-code driven inspections and compliance tracking. Its user-friendly interface ensures accessibility for all staff levels. Enfinite members enjoy exclusive discounts on MyMomentum subscriptions.

EHS Consulting Services: EHS Momentum also helps Enfinite members by developing program documentation and providing coaching and tools to ensure OSHA-compliant safety management systems. We also assist in due diligence support, acquisition integrations, and agency advocacy.



OSCAL.AI provides an advanced collection optimization system using Artificial Intelligence designed to enhance material collection operations for liquid recycling companies. Our technology ensures that collection efforts are demand-driven, meaning trucks are dispatched based on real-time material needs rather than static schedules. The system analyzes collection demand, predicts optimal pickup times and dynamically adjusts operations before considering routing constraints, ensuring efficiency at its core.



Otodata offers remote tank monitoring services. Our monitors track the fill level of customers' tanks and send that information via the cellular network to an online dashboard and customized apps. Our devices are battery powered (10+ year battery life), are fully waterproof, and even meet C1D1 certification. We have a wide variety of methods to monitor tank levels such as radar, pressure sensors, and scales.



SkyBitz provides a comprehensive IoT-powered tank management ecosystem that includes Remote Tank Monitors and the Next-Gen SmartTank™ Portal. This combination delivers a fully integrated hardware and software solution that simplifies tank monitoring and management. The key features of these products/services include:

**Remote Tank Monitors:** These devices are known for their accuracy in monitoring tank levels. They provide real-time data on tank status, helping businesses keep track of their inventory and avoid running out of essential supplies.

**Next-Gen SmartTank Portal:** This portal is the core of the SkyBitz ecosystem. It integrates seamlessly with the remote tank monitors to optimize workflows and deliver actionable insights. The portal offers advanced analytics, intuitively designed tools, and audit capabilities that empower data-driven decisions. It ensures effortless adoption and synchronization across devices, making it easy for businesses to implement and use.



WASTELINQ offers cloud-based software built for managing waste. Our platform connects generators, transporters, and disposal facilities through tools that simplify profiling, automate routing, and streamline compliance documentation. Features include electronic manifests, AI-powered profile creation and management, cost tracking, order management, inventory reconciliation, and integration with accounting and ERP systems. ENFINITE members can use WASTELINQ to manage operations, improve coordination, and gain visibility across the waste lifecycle.

## Pacific Resource Recovery

M. DIANE MCCORMICK

As one of a limited number of hazardous waste treatment facilities nationwide, Pacific Resource Recovery isn't leaning heavily into marketing its latest expansion.

"It's almost a 'Field of Dreams' scenario," said Michael Jeffries, vice president of sales and business development. "If you build it, they will come. It comes down to what can we treat, what can we handle, what kind of things can we accept at what kind of volumes?"

Pacific Resource Recovery represents a new wave of ENFINITE membership, bridging the worlds of industrial liquid recycling and hazardous waste processing. As chair of Enfinite's new Hazardous and Specialty Waste Council, Jeffries hopes to help lead the entire industry to new heights in public awareness and policy impact.



Pacific Resource Recovery

CLIENT AND ENVIRONMENTAL PROTECTION

### The PRR Story

From its origins in manufacturing coatings for auto body shops, Pacific Resource Recovery entered waste recovery in 1979.

That's when owner Bob Berg created a closed loop recycling and reselling service for customers' paint and solvent waste, a value-add solution to help prevent waste dumping into landfills and waterways.

In the early 1990s, PRR evolved into hazardous waste when the California Department of Toxic Substances Control

required a hazardous waste permit. Still, paint remained the primary focus until 2017, when that portion of the business was sold to a larger company.

Today, PRR is a third-generation, fully permitted blending, bulking, and consolidation firm "in the heart of downtown Los Angeles," said Jeffries. Berg's daughter, Sandra Berg, is chair. Her daughter, Jennifer Lahoda, is co-president with Veekan Tashjian, who grew up with the company as the son of Berg's partner and head product chemistry formulator.

"This business has a ton of history, a ton of connection to the past and the roots and foundation of who the company is," said Jeffries. "Everything this company does is rooted in the main core value, which is care. A lot of companies have four or five core values. We have subsidiary values, but at the end of the day, it all comes out of care."

Sale of the original paint side created the space needed to focus entirely on hazardous waste. In the wake of that shift and significant expansion, Jeffries joined PRR in 2022, continuing his career in environmental services. After consulting with PRR on its successful permit renewal in 2024 – a "big deal in the hazardous waste industry" – he was hired to execute the strategic growth plan.



Hazardous waste “is a broad term” encompassing a wide spectrum, from regular paint and solvent waste to extremes such as oxidizers, spontaneous combustibles, and highly reactive rocket fuel, Jeffries said. Because each segment requires specialized handling, facilities treat different wastes, depending on their capabilities.

PRR accepts waste on the lower levels of the hazard spectrum, including solvent and paint waste, packaging production trash that might be contaminated with paints and heavy metals, and – newly permitted – corrosive materials.

A tank farm and mixing process also empowers PRR to accept high-BTU solvents, such as naphthas, petroleum distillates, paint waste, and some types of acetone. All are commonly used in manufacturing, as well as for industrial cleaning.

The resulting liquids are shipped to fuel cement kilns, offsetting the use of coal, oil, or natural gas.

“It’s called waste-derived fuel or supplemental fuel, but it’s a true recycling, reuse purpose,” Jeffries said.

Pacific Resource Recovery offers treatment and disposal solutions for a range of sectors – “any industry you can possibly think of that generates any waste at all.” Many are cutting-edge, including chip makers, aerospace, universities and auto manufacturing.

Government agencies serviced include the Department of Defense and Customs and Border Patrol, whose confiscated materials often contain hazardous wastes. In biotech and life

sciences, solvents are deployed in research to extract properties from materials and in manufacturing for cleaning.

“You’d be surprised how many solvents are used in the process of researching and manufacturing of medicines and pharmaceuticals,” said Jeffries.

PRR’s direct customers are hazardous waste brokers or service providers – the companies that help businesses and agencies package their waste onsite and ship to treatment facilities.

Once the materials arrive at PRR, a high-tech tracking system assures compliance with oversight from about two dozen regulators, from air quality to fire departments.

“Compliance and safety is a big name of the game in our world,” said Jeffries. “If you don’t have that, you won’t have business, or you don’t belong.”

### **Enfinite Alignment**

PRR’s emphasis on responsible reuse and disposition of hazardous wastes creates its entry point to ENFINITE membership. Although the liquids PRR recycles are more hazardous than regular oil, the sibling sectors share a mission and challenges in the work that Jeffries calls “vitally necessary.”

By joining ENFINITE, Jeffries hopes to help the industry elevate its reputation and visibility. Many players have shied from the spotlight, he said, scared away by the bad actors and illegal dumpers who gave the industry a bad name in the early, post-Love Canal years – and who gave Hollywood a convenient



villain for countless movies.

“Our industry is highly underrepresented in the mainstream world as far as understanding, awareness, and education,” he said. “The public does not appreciate what we do and doesn’t understand what we do.”

The decision to join ENFINITE wasn’t based on networking, because PRR is linked to a strong national network among the small number of companies conducting hazardous waste blending and recycling, Jeffries said.

Instead, lobbying and policy input were the primary motivators.

“What’s going to get hazardous waste involved is representation and being part of a group,” he said. “If we feel we’re dealing with the same problem and need to communicate with the federal government, state government, or local authority, that’s going to be very, very worthwhile.”

Jeffries also sees opportunities to leverage and promote the industry’s position as critical infrastructure – a status proven by COVID.

“They used to just pour the stuff into rivers and ditches,” he said. “We’ve come up with ways to manage it safely, process it safely and recycle most of it.”

In the age of eco-awareness, he added, liquid waste recyclers are “the real environmentalists.”

“We’re the ones actually doing things,” he said. “We’re taking waste and keeping it out of your water supply or preventing it from contaminating a playground.”

## Joining Forces

The Hazardous and Specialty Waste Council emerged from ENFINITE’s recent rebranding. Jeffries and others in hazardous waste expressed interest in collaborations that elevate the full industry’s presence in policy and regulatory circles, and in the public eye.

For instance, a public service announcement produced to air in key markets could counter negative narratives and raise awareness of the benefits of waste facilities.

“The stuff we’re managing is already in your community every day,” he said. “It’s in your house. The pesticides you use, the household cleaners – those are some of the most hazardous things that exist. The difference is, we can manage them when you’ve got a little bit left and don’t want to throw it in the trash. You can take it to the local collection facility, and it comes to a facility like ours.”

ENFINITE lobbies on behalf of its members and is equipped to help with the regulatory challenges for the entire industry, including its small and mid-sized players, Jeffries said. As for compliance, the Trump administration’s regulatory freezes – especially over PFAS – have left “everything up in the air with

EPA.” In this atmosphere, ENFINITE offers an avenue for vigilance over a swiftly-moving scenario.

## Opportunities and Challenges

While hazardous waste can offer opportunities for traditional recyclers of industrial liquids, expanding into the segment presents “huge barriers,” said Jeffries. “You need expertise. We have seen people dabble in the past, but they usually don’t do well because they don’t understand the regulations. The regulations are massive, and they should be, for good reason.”

However, he adds, market forces are driving a convergence of the two sides. Investors flooding into hazardous-waste management are generating consolidation. As their acquisition targets dwindle, they are widening their sights to include hazardous waste processors that recycle oil and water as a sideline, or vice versa.

PRR continues its own growth trajectory. A major expansion is expected to double the number of employees, now around 40, by early 2026. Permit modification, plus availability of the former paint division’s space, is allowing PRR to build out for new waste streams. Upgraded storage, fire prevention and suppression systems, and air emissions controls create new and expanded capacities.

“There are a lot of waste streams from our customer base that we have not received, historically,” said Jeffries. “We didn’t have the permit or the processing capability to accept them. Now, we hardly have to go to them to ask for their business. Once we got the word out, they’re beating the door down asking when they can send the new waste streams.” ■

### Contact:

Mike Jefferies  
Pacific Resource Recovery  
mjeffries@pacificresourcerecovery.com



Join more than 150 industry leaders in Chicago this June for the 2025 ENFINITE Mid-Year Meeting. This event offers unmatched opportunities for networking, collaboration and professional growth.

### **Register Now**

Registration forms can be found on page 20 or register online by scanning the QR code at the bottom of this page.

### **Exclusive Safety-Kleen Re-refinery Tour – Add for just \$50**

This year's agenda features an optional tour of the Safety-Kleen re-refinery, scheduled for Wednesday, June 18. Attendance is limited to 50 participants, and you must be registered for the Mid-Year Meeting to join the tour.

To reserve your spot, purchase a tour registration through the ENFINITE website or call headquarters at 703-753-4277.

### **Stay in the Heart of Chicago**

The Mid-Year Meeting will take place at the InterContinental Chicago Magnificent Mile, offering easy access to the city and a comfortable stay for attendees. A limited block of discounted rooms is available until May 27, 2025, at a rate of \$289 per night (plus applicable taxes and fees).

To book your room, visit [noranews.org/2025MYHotel](https://noranews.org/2025MYHotel) or call the hotel directly at (312) 944-4100. Be sure to mention the ENFINITE Group/booking code FJQ to receive the discounted rate.

### **Sponsorship & Advertising Opportunities**

Looking to boost your brand visibility? The Mid-Year Meeting offers a variety of sponsorship and advertising options to help you connect with industry decision-makers. See page 19 to review the available sponsorships. You can also visit the ENFINITE website using the link [noranews.org/25mysponsorships](https://noranews.org/25mysponsorships).

### **Questions?**

For more details on registration, hotel accommodations, or sponsorship opportunities, visit the ENFINITE website or contact headquarters at 703-753-4277.



# Go Behind the Scenes: Safety-Kleen Re-Refinery Tour Set for Mid-Year Meeting

Attendees of the 2025 ENFINITE Mid-Year Meeting will have the unique opportunity to tour Safety-Kleen's East Chicago re-refinery on Wednesday, June 18. This exclusive, optional tour offers a firsthand look at the largest used oil re-refining facilities in North America.

Space is limited to 50 participants, and registration is required. Those interested can purchase a tour registration through the ENFINITE website or contact headquarters at 703-753-4277.

**Note:** You must be registered for the Mid-Year Meeting to attend the tour.



**Don't miss this chance to see the industry's most robust facilities in action.**

## MID-YEAR CEO PERSPECTIVE



### **Looking Ahead: Forecasting the Industry's Future**

Presented by Brian Recatto, Crystal Clean President & CEO

Crystal Clean operates a nationwide network of more than 120 facilities. Like many ENFINITE members, Crystal Clean began as a parts cleaning and used oil collection service but it has evolved over the years to offer an expansive range of environmental and industrial services. As a leader in the industry with a large national footprint, Crystal Clean has a unique perspective on the industry that ENFINITE represents. The recycling, environmental and industrial services offered collectively by ENFINITE members mirror those of Crystal Clean. President and CEO Brian Recatto will share his view on the opportunities and challenges for the industry over the next five years.

*Tentative as of 4/14/2025. Subject to change.*

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**WEDNESDAY, JUNE 18**

Departure - 11:30 AM	Optional Safety-Kleen Re-Refinery Tour <i>(add-on registration required. Limited to first 50 people)</i>
4:00PM - 5:15 PM	Board of Directors Meeting
4:30 PM - 7:45 PM	Registration
5:15 PM - 5:45 PM	New Member & Board Member Reception <i>(For new members and 1st time attendees)</i>
5:45 PM - 7:45 PM	Opening Reception

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**THURSDAY, JUNE 19**

8:30 AM - 6:15 PM	Registration/Check-In
8:30 AM - 6:15 PM	Display Tables Available for Premier Sponsor
8:30 AM	Continental Breakfast
8:45 AM - 9:00 AM	Committee Chair Meeting
9:15 AM - 9:45 AM	Welcome
9:45 AM - 10:30 AM	Morning Presentation
10:30AM - 11:00 AM	Break
11:00AM - 11:35 AM	Advanced Processors Committee
11:35 AM - 12:10 PM	Industrial & Environmental Services Committee
	Hazardous & Specialty Waste Council
11:35 AM - 12:10 PM	Conference Committee
12:10 PM - 12:40 PM	Lunch
12:40PM - 1:30 PM	Lunch Presentation
1:45 PM - 2:25 PM	Membership and Marketing Committee
1:45 PM - 2:25 PM	Antifreeze Committee
2:25 PM - 3:30 PM	Wastewater Committee
3:30 PM - 4:15 PM	Guiding Principles Committee
	Used Oil Recycling Committee
	Government Affairs Committee
4:15 PM - 6:15 PM	Happy Hour Reception

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**FRIDAY, JUNE 20**

8:15 AM - 9:15 AM	Past Presidents Committee
9:15 AM - 11:00 AM	Board of Directors Meeting

# 2025 SPONSORSHIPS

## MID-YEAR MEETING

June 18-20, 2025 | Chicago, IL

### EXCLUSIVE SPONSORSHIPS

**Opening Reception Sponsorship** **SOLD \$2750**

Exclusive sponsorship. Offered on a first-right of refusal basis.

**Key Card Sponsor** **SOLD \$2500**

**Only one available.** Your company logo and message will be printed on all room key cards given to attendees staying at the hotel. Offered via lottery.

**Charging Station Sponsor** **SOLD \$1700**

**Only one available.** Your logo will be custom printed on the charging station table located at registration. Offered via lottery.

**Audio/Visual Sponsor** **SOLD \$1700**

**Only one available.** Your logo will be prominently displayed when the "splash screen" is displayed in the main meeting room on Thursday. This also includes a full page color ad printed in the committee book. Offered via lottery.

**Lanyard Sponsor** **SOLD \$1700**

**Only one available.** Your company logo will be printed on the lanyard distributed to all attendees. Offered via lottery.

**Notebook Sponsor** **SOLD \$1700**

**Only one available.** Your logo will be on the notebook placed at each seat at the beginning of the Mid-Year Meeting. Offered via lottery.

**Can Cooler Sponsor (Coozie Style)** **SOLD \$1200**

**Only one available.** Your Company logo will be printed on the can coolers placed next to the bars at Happy Hour on Thursday. Offered via lottery.

*Non-Members add \$1000 to purchase price.*

**Registration Sponsor** **SOLD \$1700**

**One available on a first come, first served basis.** Your company logo will be printed on custom computer clings at the registration desk as well as on a small sign at the registration desk. In addition, your company logo will appear on the confirmation email for the event.

### Premier Sponsor

**Full Page Color Ad** **\$1000**

**1/2 Page Color Ad** **\$800**

Premier sponsors have the opportunity to use a 6' table near the ENFINITE registration desk to display company information and literature for the duration of the meetings on Thursday and are allowed up to 60 seconds to address the entire group at the beginning of the meeting on Thursday. Your company logo will be printed on the front cover of the committee book, and on a large sign inside the meeting room. This also includes a full page color or B&W ad printed in the committee book. Please note that meeting space allows for materials to be displayed only on a 6' table. Tables are assigned on a first-come first-served basis on the day of the event. Floor signs are not permitted.

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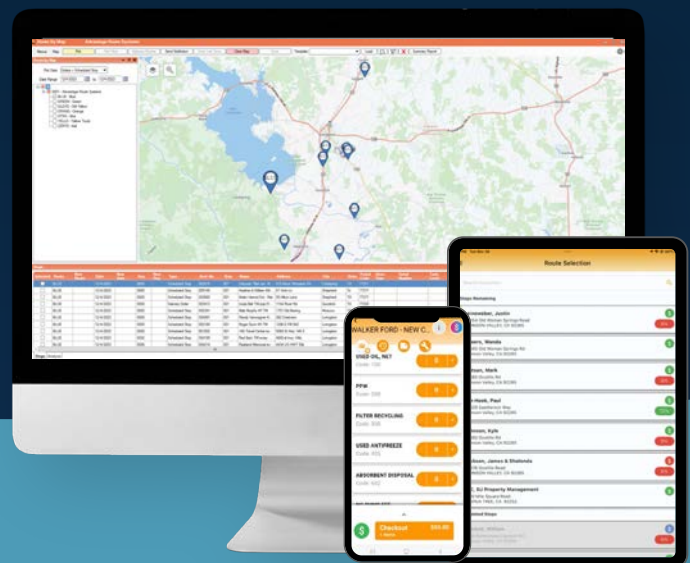
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# A REGULATORY TUG-OF-WAR

KYLE MCDONALD, CES, LEAD PROJECT SCIENTIST, TRIHYDRO CORPORATION

Welcome to this edition of PFAS Perspectives, a part of our recurring Liquid Recycling series, designed to keep ENFINITE members informed about the latest technical and regulatory developments surrounding per- and polyfluoroalkyl substances (PFAS). Given the dynamic landscape of PFAS regulations and technologies, we aim to keep members engaged through ENFINITE's participation in the Barnes & Thornburg PFAS Regulatory Coalition and insights from Trihydro's PFAS management expertise. In this article, we summarize the PFAS regulatory tug-of-war for federal and state-level PFAS activities and rulemaking.

## **Slack on the Line: Federal PFAS Action Slows Under the New Presidential Administration**

At the end of 2024, the USEPA released its third progress report on the PFAS strategic roadmap, summarizing the many key regulatory actions taken under the prior presidential administration to better prevent and manage PFAS impacts to human health and the environment. Key highlights included final Maximum Contaminant Levels (MCLs) for six PFAS compounds in drinking water under the Safe Drinking Water Act (SDWA); final designations for two PFAS compounds as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act

(CERCLA), reporting requirements under the Toxic Substances Control Act (TSCA), an update to USEPA's PFAS destruction and disposal guidance, and expansion of PFAS coverage under the Toxic Release Inventory (TRI), among many other regulatory actions. Summaries of these and other PFAS activities can be found in our previous Liquid Recycling PFAS Perspectives articles.

With the transition to the second Trump Administration, the future direction of federal PFAS regulations remains uncertain. The first Trump Administration initiated many of the PFAS actions seen over the past six years with its February 2019 PFAS Action Plan, casting some uncertainty on what direction the new administration may head. Additionally, the newly appointed USEPA Administrator, former New York Representative Lee Zeldin, has historically supported federal PFAS regulatory initiatives, including his membership on the congressional PFAS Task Force and support of the 2023 PFAS Action Act, which directed USEPA to move forward with CERCLA hazardous substance designations and drinking water regulations under the SDWA. How the new administration navigates PFAS policies within the broader deregulatory agenda remains to be seen.

Early executive orders issued by the new Administration have already impacted PFAS regulations. A Regulatory Freeze



Pending Review order (January 20, 2025), required that any non-final rules pending in the Federal Register be withdrawn. This action resulted in near immediate withdrawal of a Clean Water Act Effluent Limitation Guidelines and Standards for PFAS Under the Organic Chemicals, Plastics, and Synthetic Fibers (OCSPF) Point Source Category, which would have been used as the basis for effluent limits under National Pollution Discharge Elimination System (NPDES) permits for industrial wastewater discharges from subject sectors. This rule was posted to the Federal Register on January 21, one day after the executive order, but had been in USEPA's hands since March 2021 when they published their Advanced Notice of Proposed Rule Making on the topic. A January 31, 3035 executive order, Unleashing Prosperity Through Deregulation, mandates a regulatory budget where every new regulation requires ten existing ones be eliminated, casting reservations for future Federal PFAS rules.

### **Tension Builds: Contesting Existing PFAS Regulations**

Several Federal PFAS regulations finalized in 2024 are facing legal challenges. The US Chamber of Commerce and several industry groups have contested the May 2024 CERCLA hazardous substance designation for PFOA and PFOS, citing an overly broad ruling, a flawed cost analysis, and an

underestimation of the widespread consequences. The USEPA defended its ruling in a January 2025 legal brief, supported by an amici brief filed by 14 states and the District of Columbia, arguing that the benefits outweighed the disadvantages, and emphasizing evidence used in the cost analysis and scientific basis for the ruling.

Similarly, the April 2024 SDWA rule establishing MCLs for six PFAS compounds is being challenged by groups including American Water Works Association (AWWA) and the National Association of Manufacturers (NAM), arguing the ruling exceeded statutory authority, lacks scientific basis, and did not follow procedural requirements. Seventeen states and the District of Columbia have filed briefs supporting rule, emphasizing its public health benefits.

In February 2025, EPA requested 60-day abeyance in litigation challenges to both the CERCLA and MCL rulings, both granted by the D.C. Circuit, allowing the administration until late April 2025 to reconsider its stance amid broader regulatory (or deregulatory) efforts. At this time, it is unclear whether the USEPA will take action to revise past decisions on these two significant PFAS regulations.

### **Holding the Rope: Federal Delays**

On September 5, 2024, the USEPA delayed the reporting period associated with the final TSCA PFAS reporting rule until July 2025. The PFAS TSCA reporting window was originally scheduled to begin in November 2024, but was delayed due to staffing and IT budget constraints limiting the agency's ability to accept data entry. The TSCA reporting rule requires all manufacturers and importers to report any PFAS and PFAS-containing articles used since 2011 and will require extensive reporting efforts from many entities, including many not historically subject to TSCA requirements. As of this writing, no additional delays in the reporting window have been announced, however speculation on TSCA resources continue amidst broader federal budget cuts and departmental staff reductions.

On December 13, 2024, the USEPA published the draft 2026 Multi-Sector General Permit (MSGP), which includes “report only” indicator monitoring for PFAS associated with NPDES stormwater discharges from multiple industrial sectors. The comment period for the MSGP has now been extended two times; an initial 60-day extension to April 4, and a second 45-day extension to May 19, 2025. The proposed MSGP incorporates analysis of 40 individual PFAS compounds using USEPA Method 1633 as well as analysis of Adsorbable Organic Fluorine, which screens for potentially thousands of individual PFAS compounds, using Method 1621. Benchmark criteria are not included in the MSGP; however, USEPA published final aquatic life criteria and benchmarks in October 2024 that could be used as reference thresholds. In a signal that USEPA is encouraging state-level permit writers to take proactive steps on PFAS, USEPA issued a “How-To” guide for developing technology-based limits for pollutants of emerging concern, including PFAS.

### **Pulling Their Weight: States Tighten PFAS Controls**

As federal activities slow under the new Administration, state-level activity is stepping back up, mirroring pre-2023 trends. Many of the early 2025 state actions focus on banning PFAS-containing products, but environmental regulations are also advancing. For example, on March 20, 2025, Illinois adopted groundwater quality standards for six PFAS compounds, joining a growing list of dozens of states with water or soil quality environmental standards. That same day, a bill passed both house and senate in New Mexico which will regulate discarded aqueous film forming foams (AFFF) containing intentionally added PFAS as hazardous waste. This increasing state-level patchwork adds compliance complexity for ENFINITE members operating across state-lines.

### **Winning the Tug-of-War: Strategies for Industry Compliance**

As the new Administration reassesses prior approaches to regulating PFAS, the potential for rule revisions, rollbacks, and legal challenges introduces increased unpredictability for stakeholders. However, while the federal regulatory outlook remains unsettled, scientific understanding of PFAS, its environmental and health impacts, and treatment technologies continue to advance. Though this shift may slow immediate regulatory action, businesses must remain vigilant in evaluating long-term liabilities. Staying informed is more critical now than ever. Stay tuned for more insights as we continue to navigate the evolving realm of PFAS in our future PFAS Perspectives series. ■

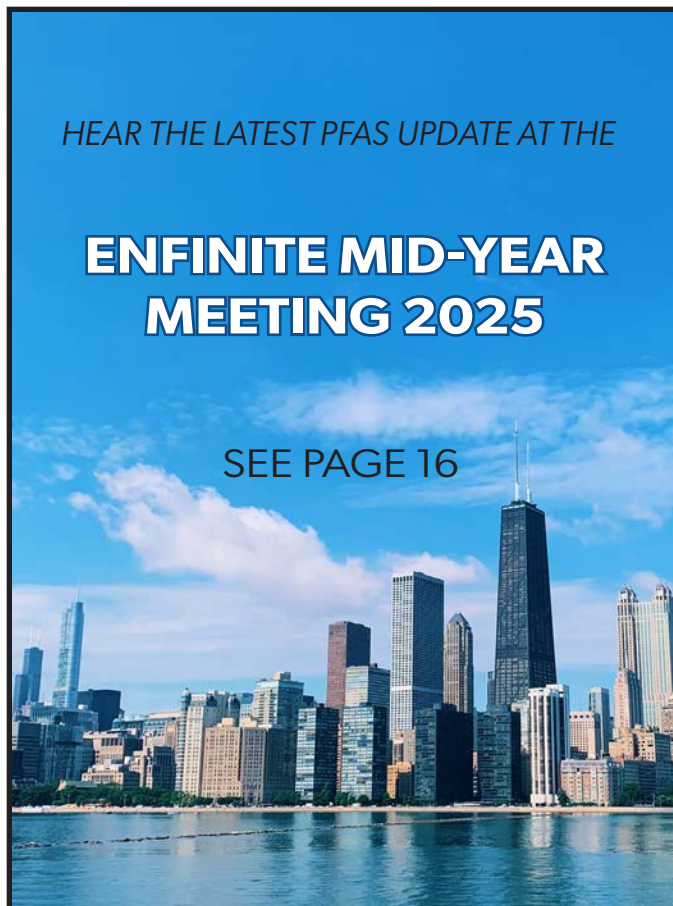
#### **Contact:**

Kyle McDonald  
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SEE PAGE 16





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# Hazardous & Specialty Waste Management Council

The launch of this new council reflects ENFINITE's expanded mission: to serve the full spectrum of our members' work. As our industry evolves, so does ENFINITE—creating new spaces for connection, collaboration and opportunity.

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**Gainesville, Virginia, April 10, 2025** – ENFINITE is proud to announce the formation of its Hazardous & Specialty Waste Management Council. The new council was formed by the Board of Directors and will have its first gathering during the upcoming ENFINITE Mid-Year Meeting, June 18-20, 2025, in Chicago, Illinois.

The mission of the Hazardous & Specialty Waste Management Council is to create a platform where members in this space can easily connect and network with each other, leading to business opportunities. It will also identify and address related opportunities and threats facing members.

Mike Jeffries, Vice President with ENFINITE member Pacific Resource Recovery, was instrumental in leading the effort to create the new

council and will serve as its first Chairman.

“The creation of the Hazardous & Specialty Waste Management Council is part of ENFINITE's commitment to represent the wide variety of environmental and industrial services our members provide,” stated ENFINITE Executive Director Scott D. Parker. “While not all members manage hazardous and specialty waste, members are increasingly involved with these materials as companies grow and diversify, and ENFINITE is prepared to serve them.”

For those interested in participating in the inaugural ENFINITE Hazardous & Specialty Waste Management Council, more information can be found on page 16, or at [www.noranews.org/2025MYInfo](http://www.noranews.org/2025MYInfo).

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# PLANNING FOR AN OSHA INSPECTION

TAMIE KERR, ENVIRONMENTAL SPECIALISTS INC

Imagine that you just sat down at your desk, ready to drink your first cup of coffee, and you get a call saying there is an OSHA compliance officer in the lobby. The words “OSHA inspection” can create fear in most plant managers and business owners, but it doesn’t have to be that way if you have done your homework and have a plan in place.

## Create the Action Plan

The company’s receptionist or greeter is the first line of defense. They should know, in advance, what to do when OSHA is at the door. The information that needs to be communicated to the receptionist is:

- Where to put the compliance officer while he/she waits for management personnel
- Who on the management team do you contact? The hierarchal order for greeting the officer should be outlined on paper
- Act professionally and do not engage in conversation regarding plant operations—this conversation is for the management team

The management team members should have basic knowledge of the OSHA inspection process and the company’s overall safety programs. At least one member of the team should have a solid grasp of OSHA standards.

## Arrival of the Compliance Officer

When the OSHA compliance officer arrives at your business, they will present their credentials. Compare the photograph to the person sitting in front of you and record the serial number

on their credentials. If your company policy is to have visitors sign a register, have the compliance officer do so. You can also request that they wear a “Visitor Pass.” Do not ask the compliance officer to sign any type of waiver or release—they will not.

The receptionist or greeter should escort the compliance officer to the designated waiting area. Do not permit the compliance officer to roam freely throughout the building. If your company’s primary contact is not in the office when the compliance officer arrives, he/she will wait for a reasonable amount of time—usually an hour—after which they may choose to leave and come back at another time. Keep in mind that inspections are not normally cancelled. An unplanned inspection will continue even during labor disputes.



## Opening Conference

When all parties are assembled, the compliance officer will explain the role of OSHA and ask to conduct an inspection. If you refuse to allow the compliance officer to conduct the inspection, they will need a warrant to enter the facility. It is recommended that you at least answer basic questions about the company.

Subpoenas can be issued if you refuse to answer any questions—even simple ones—or if you refuse to show illness and injury logs or other records spelled out in the hazard communication standard. OSHA standards obligate the employer to permit compliance officers access to employee exposure and monitoring records. It’s generally not recommended to refuse the inspection.

You will be informed as to the scope of the inspection.



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OSHA may conduct an inspection for several reasons, including the following, which are listed in order of priority:

- Imminent danger situations where there are hazards that could cause death or serious physical harm.
- Severe injuries and illnesses—employers must report:
  - Work-related fatalities within 8 hours
  - Work-related hospitalizations, amputations, or losses of an eye within 24 hours
- Worker complaints or allegations of hazards or violations
- Referrals of hazards from other federal, state or local agencies, individuals, organizations or the media
- Programmed inspections targeted at specific high-hazard industries or individual workplaces that have experienced high rates of injuries and illnesses
- Follow-up inspections, which check for abatement of violations cited during previous inspections are conducted by OSHA in certain circumstances

Also, during the opening conference, the compliance officer will collaborate with you to decide the most logical route to take for the inspection. The shortest route is always the best—remember, they are always looking around for safety hazards.

On the other side, if the compliance officer is at your facility to examine a piece of equipment involved in an accident and it is at the other end of the plant, don't take them out the door and walk all the way around the building to get inside. Those actions look somewhat suspicious, like you are trying to hide something.

### The Walk Around

It's time to walk around your facility. The members of the tour party may include the following individuals:

- Upper Management
- Plant Manager
- Safety Manager/Director (a definite must)
- Maintenance Manager
- Employee Representative
- Others as needed

During the opening conference, you will have discussed the inspection route. Most inspections will follow the process flow of the facility unless there has been a fatality, injury, complaint or referral. Plan, however, for a wall-to-wall inspection, whether you like it or not.

One or more members of the tour group should keep notes and observations of interest to the compliance officer. If they stop and observe an operation or piece of equipment, you will want to note that. And by all means, take photographs of items that are of interest to the compliance officer. Photographs should be taken with a company-owned camera or cell phone—not a personal cell phone. Using your personal cell phone to take pictures of work-related issues opens the potential opportunity for your phone to be subpoenaed in the event of an accident, injury or other situation that could lead to an investigation. Do you really want outsiders to see what is in your photo gallery or text messages?

Answer all questions truthfully, without directly admitting guilt. Don't offer any unsolicited information. Do not talk about

accidents or incidents that occurred in the past unless specifically asked to do so. You are talking to a compliance officer—you are not speaking to a priest in the confessional. You do not have to divulge each and every sin without being asked. And by all means, do not be rude to or argue with the compliance officer.

If you disagree with their assessment, make note of the issue and write it down. You can address the situation during the closing conference or at the informal conference after the citations have arrived.

During the inspection, the compliance officer may look for violations some refer to as “low-hanging fruit”:

- Lack of signs and labels (a willful violation)
- No labels on pipes
- Lack of container labels
- Lack of machine guarding labels and/or lack of machine guarding
- Improper fire extinguishers for the materials being used
- Unreadable ladder signage

And this is just a brief list of violations that are obvious.



They also may make note of employee working conditions, which include:

- Noise levels
- Poor visibility or lighting
- Hectic activity such as multiple forklifts in a shared space
- Inadequate training
- Trip or slip hazards
- Extreme temperatures
- Humidity

The compliance officer may conduct employee interviews during the inspection. They may want to speak to the employee about a particular incident or complaint, or about safety issues in general. The employee has the right to be interviewed and can request an employee representative be present during the interview, but it can also be done privately.

The employee also has the right to end the interview at any time. You, as an employer, cannot retaliate in any way against an employee for participating in an OSHA interview or for telling an OSHA inspector the truth.

Employees are protected under Section 11(c) of the OSH Act and should be informed of this at the beginning of the interview process. Section 11(c) of the OSH Act protects employees from discrimination by employers for exercising their rights under the Act. Specifically, no person shall discharge or discriminate against any employee for filing a complaint, participating in an investigation, or reporting a work-related injury or illness. Section 11(c) ensures that workers can safely report safety concerns without fear of retaliation.

If, during the walkaround, a violation or hazard is observed, you can take steps to abate the issue at once. The compliance officer will only identify the issue—it is up to you to decide how to correct it. They may relate abatement practices that they have observed during other inspections and may explain the pros and cons, but they will not tell you specifically how to fix it.

If you know you have similar violations in other parts of the plant, you should fix them before the compliance officer gets there. Perhaps have someone from the tour party discreetly move off to the side or feign the need to use the restroom and contact personnel who can rectify the violation at once.

### **The Closing Conference**

After what may seem like an eternity, the walkaround is finally over, and the closing conference can begin. With sweaty palms and beating hearts, you all file into the conference room to find out what hazards and violations were identified.

Who should attend the closing conference? In addition to the OSHA compliance officer, both management and employee representatives can be present if the common goal is health and safety. There can also be separate conferences. The employee representative meeting will be first.

The compliance officer will discuss any unsafe conditions observed—don't interrupt. They will itemize the hazards and violations for which citations will be recommended and issued. If no specific standard exists, the General Duty Clause, Section 5(a)(1), will be cited. During the meeting, you will want to take notes—copious notes. You may even want to record the meeting. If you have any questions, feel free to ask them, but do not argue with the compliance officer.

No citations will be issued during the closing conference. OSHA has six months to issue a citation from the time of the inspection. The compliance officer may want to review regulations or request additional testing if the issue is related to industrial hygiene hazards or violations. In addition, the compliance officer may want to talk to the district/area director for guidance.

### **The Arrival of Citations**

Any citations that are issued should arrive by certified mail within six months. As soon as the receipt is signed, the period in which you can contest citations begins. The company has 15 working days to file a notice to contest. You can request an informal hearing. You will want to convene a meeting of your team to discuss violations and abatement options. Time is of the essence—be aware of abatement dates; they can vary.

If you choose to contest the citations, you can request an informal conference with your OSHA Area Office. This conference should be requested within 5 working days of receiving the citation. This is accomplished by signing a settlement agreement. The conference must be held—not scheduled—within 15 days of receipt of the citation. If a notice of contest has been filed, an informal conference will not be held.

Why you should request an informal conference:

- To show that you have corrected the citations
- Better understand the standards
- Get advice on how to correct the hazard or violation
- Discuss proposed penalties and how they are computed
- Discuss abatement dates
- Obtain answers to any other related questions

It is almost always recommended to request an informal conference.

All citations must be posted at or near the site of the violation to ensure employees are aware of the hazards. If the citation cannot be displayed correctly in that area, it must be posted where all affected employees will notice it. Good locations are near a time clock or in the lunchroom on a community bulletin board. You are required to keep the citation posted for three working days or until the violation is corrected—whichever takes longer. Also, ensure the citation is not defaced, altered, or covered during the posting period. Putting the citation in a protective plastic sleeve is one option.

Going through any type of inspection—whether it is with OSHA, the EPA, or DOT—can be daunting. Being prepared will help the inspection go much better, and by all means, be courteous. Your behavior is important. ■

#### **Contact:**

Tamie Kerr  
Environmental Specialists Inc  
tkerr@esrecycling.com

# SUPPLIER/VENDOR LISTING

ENFINITE Supplier/Vendor Members in good standing as of 4/4/2025 are listed below. Companies in **bold** have an ad in this magazine. Companies with a \$ are part of the ENFINITE \$ave program by offering discounts/value added services to ENFINITE members. Contact ENFINITE to learn more about the ENFINITE \$ave program. Companies in red are exhibiting at the 2025 ENFINITE Conference & Trade Show as of 4/4/2025.

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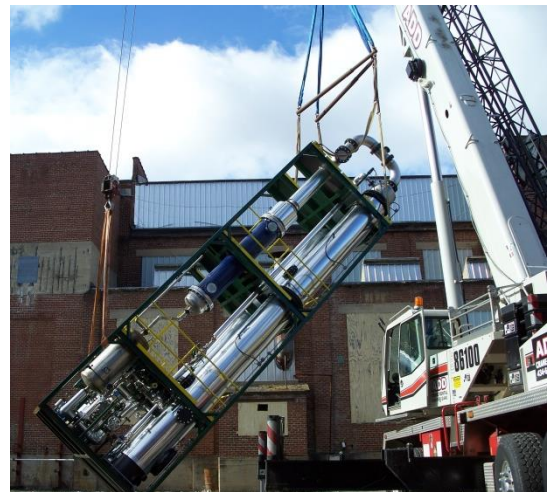
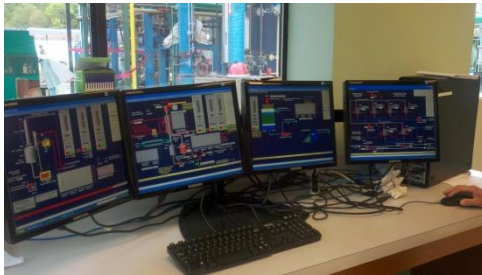
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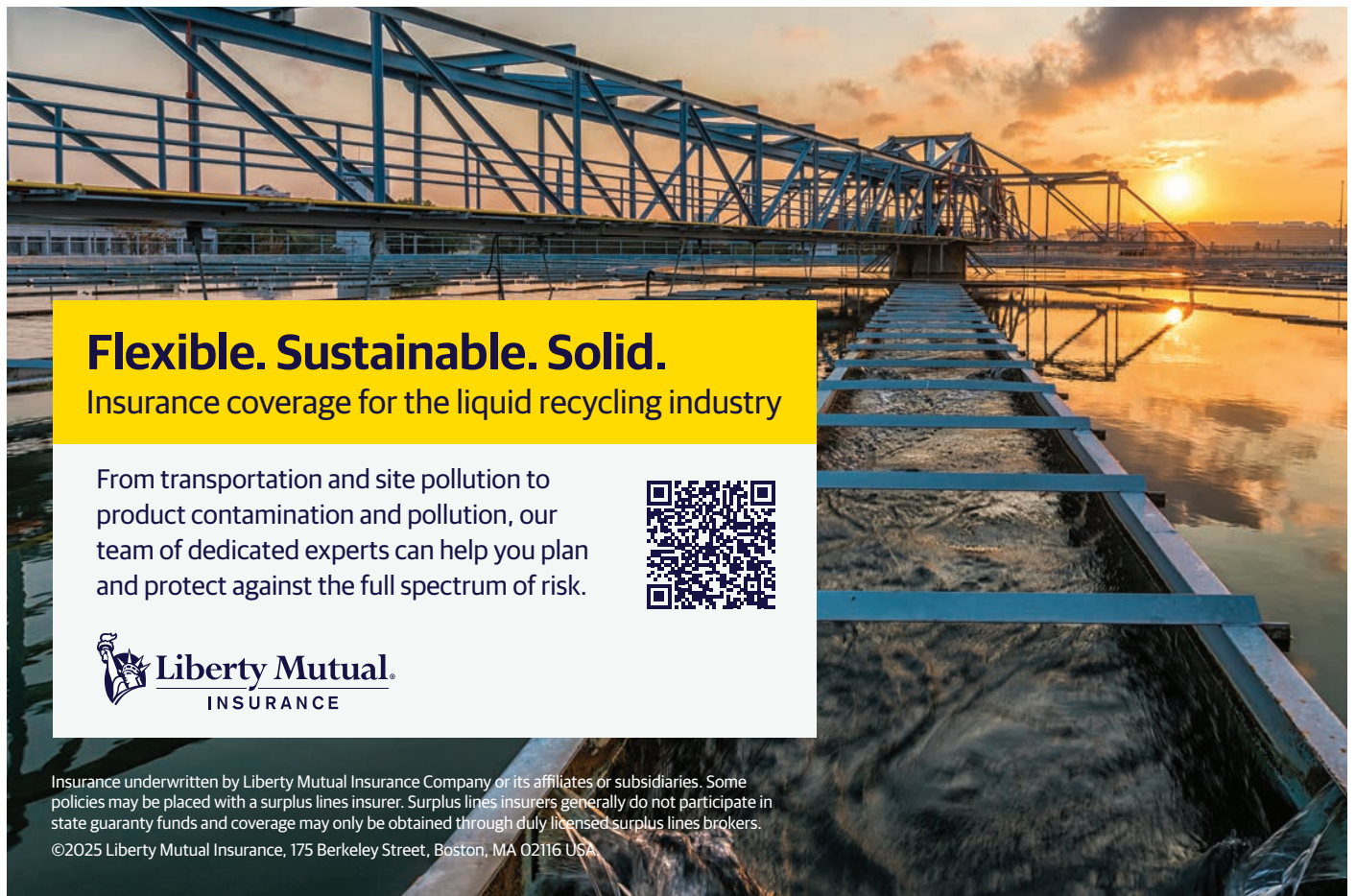
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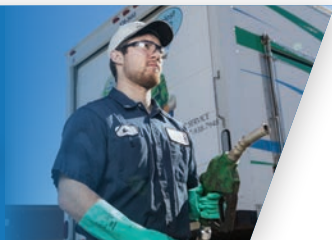
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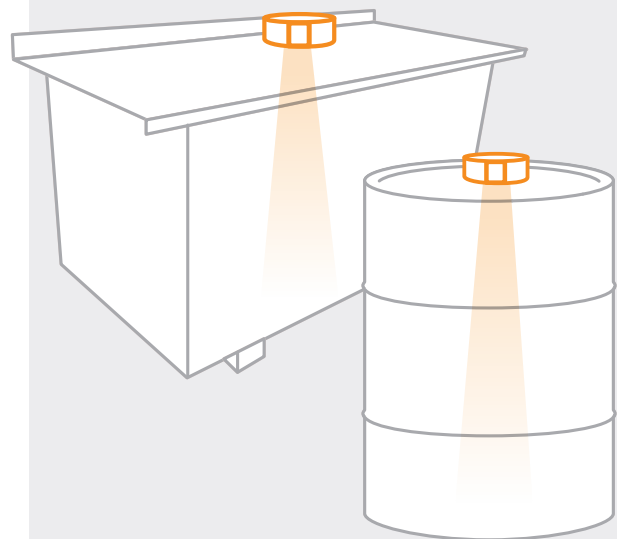
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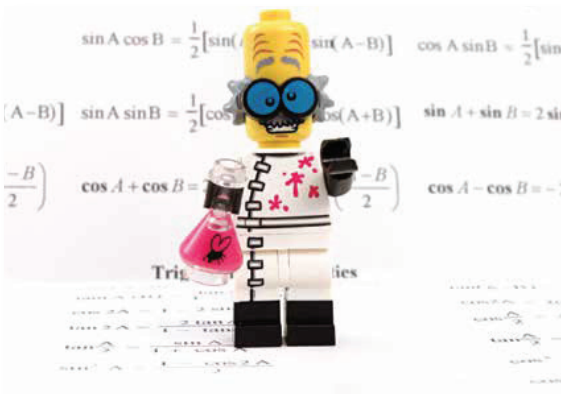
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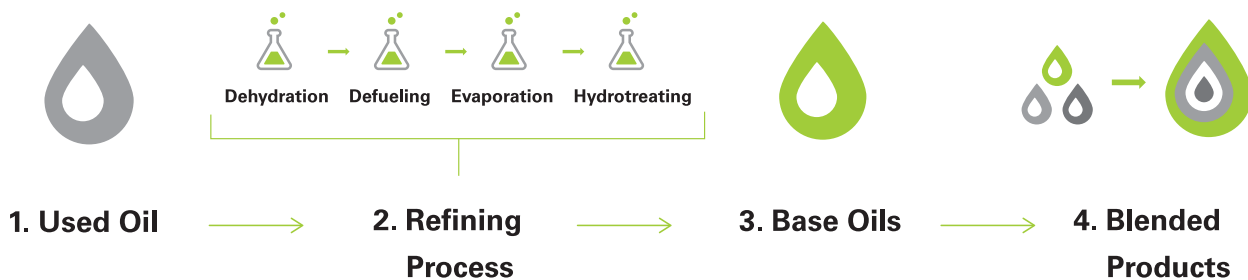
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