

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

2) Facility Information

Kemira Water Solutions Inc
2360 Doug Barnard Parkway
Augusta, Georgia 30906
Richmond County

EPA ID#: GA0000081281
NAICS #: 325180 - Other Basic Inorganic Chemical
Manufacturing

3) Responsible Officials

Jonathan Whitesell
HSE Specialist
Kemira Water Solutions Inc.
jonathan.whitesell@kemira.com

4) Inspection Participants

Jonathan Whitesell, Kemira Water Solutions	Kynslei Fay, GAEPD
Phillip Stevens, Kemira Water Solutions	Novelle Smith, USEPA
Ken Buchanan, Kemira Water Solutions	Margaret Zacharias, USEPA
	Paula Whiting, USEPA

5) Date of Inspection

January 7, 2025 at 9:00 AM EST

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279

Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018)

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(8)], secondary materials that are reclaimed and returned to the original process or processes in which they were generated where they are reused in the production process are not solid wastes provided that the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.07(1) [261.4(a)(8)] (hereinafter referred to as the “Closed-Loop Recycling Exemption”) are met.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Kemira Water Solutions, Inc. compliance with the applicable

requirements of RCRA and the corresponding Georgia Department of Environmental Protection (GAEPD) regulations. This was an EPA lead inspection.

8) Facility Description

Kemira Water Solutions Inc. manufactures chemical solutions for water-intensive industries such as industrial and municipal water treatment operators, and pulp and paper industry. The Augusta facility started manufacturing sodium chlorate in 1994. Sodium chlorate is the raw material for chlorine dioxide (ClO₂), which is produced on-site at the pulp mills, and it is the primary bleaching agent for kraft pulp. Chlorine dioxide is produced from sodium chlorate using different reducing agents, such as hydrogen peroxide, sulfur dioxide, methanol, and hydrochloric acid. Sodium chloride is the primary raw material used to produce sodium chlorate. The raw material is brought to the facility via truck. The majority of sodium chlorate is produced by passing a direct electric current through a sodium chloride brine in several electrochemical cells. The brine overflows into each cell which increase sodium chlorate and reduces the salt. The finished product is shipped directly to customer via railcar.

Kemira Water Solutions Inc. Augusta facility employs 40 employees with 19 employees handling hazardous waste. The facility operates four shifts, 24 hours a day, seven days per week.

Kemira Water Solutions Inc.'s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 16, 2024, characterized the facility as a Large Quantity Generator (LQG) of hazardous waste. Kemira Water Solutions Inc. may generate D001, D002 and D007 hazardous waste streams, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes. This facility was last inspected on March 3, 2016, by GAEPD.

9) Previous Inspection History

GAEPD has conducted thirteen RCRA CEIs at the subject facility between 2001 and 2016 and found fourteen violations during those inspections.

On March 3, 2016, GA EPD conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

10) Opening Conference

On January 7, 2025, EPA inspectors Paula Whiting, Novelle Smith and Margaret Zacharias, accompanied by GAEPD inspector Kynslei Fay, arrived at Kemira Water Solutions, Inc. at approximately 9:00 AM. The inspectors signed in at the security office and were given chemical resistant rubber boots to wear inside the facility. Mr. Phillip Stevens, EHSQ Manager, immediately received the inspectors. Mr. Stevens, and the inspectors were joined by Mr. Jonathan Whitesell, HSE Specialist, for the opening conference. The inspectors introduced themselves, showed their credentials to Mr. Stevens and Mr. Whitesell and explained the purpose of the visit.

The inspectors described the anticipated use of equipment digital camera during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the

Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Mr. Whitesell and Mr. Stevens provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

11.1 Main Office

Kemira manages universal waste lamps in the Main Office. According to the records provided during the inspection, the facility sent one shipment of universal waste offsite during calendar year 2019. The most recent shipment of universal waste lamps was sent to Clean-lites Recycling on January 14, 2019. Facility representatives informed the inspectors that they are changing to LED lamps and the office area still using fluorescent lamps is under renovation.

The inspectors observed two cardboard containers of universal waste lamps in this area during the inspection (Pictures 1-2). One 4-foot cardboard container of Universal Waste lamps located near in an entry way was closed during the inspection by Mr. Whitesell and marked with an accumulation start date of December 3, 2024, was labeled universal waste lamps. A second 4-foot container of Universal Waste lamps, which was not closed, not marked with an accumulation start date, and not labeled universal waste lamps was stored at the end of a hallway. Mr. Whitesell immediately closed, labeled and dated the container for September 26, 2024.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

11.2 Cell Lines

The inspectors visited the control room for the electrochemical cells used in the brine conversion. The facility staff explained that only Cells 10 and 20 were in operation, and Cells 30, 40, 50 and 60 were offline. Mr. Whitesell then escorted the inspectors to Cells 10 and 20 to tour the operations. The inspectors observed two rows of multiple cells that increased in concentration as the brine flowed down the line. Mr. Whitesell explained that over time due to the corrosiveness of the process, the titanium plates used in process breakdown and generate a waste stream. No hazardous waste was observed in this area.

The inspectors next toured Cells 30 and 40. At the time of the inspection, the inspectors observed fluorescent green water on the floor the cell line. Mr. Whitesell explained that coolant consisting of water and biocide was leaking from the system but being captured by the sumps to be recirculated back into the system.

11.3 Central Accumulation Area (CAA)

Kemira manages a hazardous waste CAA in a three-sided shed attached to Cell Building C. The shed also houses the emergency spill equipment. The CAA was identified with signs which read "Caution, Hazardous Waste Storage Area." Kemira manages ignitable, corrosive and toxic waste in this CAA, and the inspectors did not observe "No Smoking" signs in the CAA.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, a generator is required to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to the following: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the large quantity generator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

The inspectors observed the following in the CAA (Pictures 3-19):

- One 55-gallon flip-lid container of universal waste batteries
- One 55-gallon container of universal waste spent aerosol cans
- One 55-gallon pig lid container of used oil pads
- One 55-gallon container of used oil labeled "used oil"
- One 5-gallon carboy of used oil
- One white 55-gallon container of used oil labeled "used oil"
- Two 275-gallon totes of used Fryquel and hydraulic oil
- One black 55-gallon container of process material for reduction testing, and an empty container as backup
- One 55-gallon container of resin was incorrectly labeled as used oil
- A blue spill kit bin filled with discarded Tyvek suits and trash.

At the time of the inspection, the inspectors observed Mr. Whitesell label and date the containers of universal waste batteries, spent aerosol cans, and used oil pads.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(f)], a SQHUW must label or mark universal waste aerosol cans (i.e., each aerosol can), or a container in which the aerosol

cans are contained, clearly with any of the following phrases: “Universal Waste—Aerosol Can(s),” “Waste Aerosol Can(s),” or “Used Aerosol Can(s).”

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

In addition, the inspectors observed that the 5-gallon carboy of used oil was not labeled, the two 275-gallon totes were not labeled used oil and the 55-gallon container of process material for reduction testing was not labeled hazardous waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

The facility is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; and it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams.

The CAA is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment. However, the inspectors did not observe that the CAA was equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.252(d)], and is a condition of the LQG Permit Exemption, a generator is required to locate equipment necessary to prepare for and respond to emergencies:(d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

11.4 Hazardous Waste Roll-off

Kemira manages a 20-cubic yard box of process sludge as a hazardous waste CAA (Pictures 20-21). The roll-off is located on an outside pad. The inspectors observed that the roll-off was dated October 26, 2024, and was ready to ship on January 20, 2025. A second roll-off is staged and ready to use.

11.5 Maintenance Shop Oil Center

The maintenance shop located in Shipping and Receiving has an oil distribution center. The inspectors observed the secondary containment pallet had used oil inside and needed to be cleaned out (Pictures 22-23).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(1) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

12) **Records Review**

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which was last updated on May 14, 2024.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan does not describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Steven Phillips is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities. However, the spill kit in the CAA was empty and being used as a trash container.

The plan includes an evacuation plan for personnel. This plan describes signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

Mr. Whitesell could not provide documentation that a copy of the Contingency Plan (and its quick reference guide) dated May 14, 2024, was submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for Field Operator and HSE Specialist. The HSE Specialist description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. However, the Field Operator description did not include the hazardous waste duties of facility personnel assigned to that position.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, (iv) the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

Kemira provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2022, 2023, and 2024. However, Mr. Whitesell, who provides training to Field Operators, had incomplete training records because he did not take the 8-Hour HAZWOPER Annual Refresher for 2022 and 2024.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, (iii) Facility personnel must take part in an annual review of the initial training required by this section.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since January 2022. Hazardous waste manifest records show that hazardous waste Process Filter Cake, Filters and Sulfate Filtrate; Sodium Chlorate Cell Sludge; Bulk Process Filter Cake; Caustic Tank Farm Sludge; and Spent Activated Carbon (non-hazardous), are routinely shipped to Envirote of Ohio (EPA ID OHD980568992), Envirote of Pennsylvania (EPA ID PAD010154045) and EQ Detroit, Inc. (MID980991566), and the most recent shipment was made in 2024.

At the time of the inspection, the inspectors observed during the manifest review that Manifest 018570034FLE Line 9b.1.described Process Filter Cake, Filters and Sulfate Filtrate, NA3077 Haz Waste Solids, NOS, 9, PGIII (Chromium)(D001) “RQ” 10 lbs., and Line 13. Waste Codes listed D007. The inspectors provided the December 26, 2023, manifest (Picture 24) to Mr. Whitesell, and noted that multiple manifests were sent with this incorrect waste code in the waste stream description. Upon review of the 2024 records, the incorrect waste code had been corrected to D007 in the description.

Weekly Inspection Records:

The inspectors reviewed Kemira’s available records of inspections of the hazardous waste central accumulation area (CAA) since January 2022. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a notes section to record observations. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log.

Waste Determination Records:

The inspectors requested and reviewed the waste profile for Sodium Chlorate Cell Sludge. The waste profile 588637 was received by US Ecology; however, the waste profile was based on generator knowledge and not on analytical results. The inspectors advised Mr. Whitesell and Mr. Stevens that the hazardous and non-hazardous waste streams need to have a waste determination conducted prior to disposal and the analytical results must be kept on file. If any area of the process changes, then the waste stream(s) must be tested again prior to disposal. A Toxic Characteristic Leaching Procedure (TCLP) is used to determine whether a waste is a toxic hazardous waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Code Ann. §12-8-62(20) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Biennial Report:

The inspectors reviewed the 2023 Biennial Report submitted to GA EPD. The inspectors observed the report had waste codes that did not apply to the waste streams in the facility. Mr. Mark Wenclawlak, Manager, Environmental Safety (former employee) compiled the report and stated in Section 10.B “Added additional waste for operational flexibility.” Mr. Whitesell nor Mr. Stevens was aware of the additional waste codes added by Mr. Wenclawlak. The inspectors advised Mr. Whitesell and Mr. Stevens to remove the additional waste codes in the upcoming biennial report that were not applicable to their operations.

13) Closing Conference

The inspectors conducted the exit meeting at 2:30 PM with Mr. Whitesell and Mr. Stevens. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

On January 16, 2025, Mr. Whitesell emailed the inspectors the following corrections:

- 1) Corrected/added more labeling to the waste reduction drum
- 2) SPCC kit corrected
- 3) The stock oil labels we have did mention the word “used” in the contents. I also wrote in used in larger lettering.
- 4) Oil transport pale was labeled
- 5) Attached is a copy of my 40-hour HAZWOPER registration payment.

In addition, Mr. Whitesell stated that they had their roll-off tested recently but were having difficulty getting the results. However, the facility was moving forward with the waste testing.

14) List of Attachments

Attachment 1 – Photo Log

15) Signed

PAULA WHITING

 Digitally signed by PAULA WHITING
Date: 2025.02.17 11:27:23 -05'00'

Paula Whiting
Environmental Engineer

16) Concurrence

ARACELI CHAVEZ

 Digitally signed by ARACELI CHAVEZ
Date: 2025.02.20 08:14:49 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

24 Photos taken on: **January 7, 2025**

Photos taken by: **Paula A Whiting**

Photos taken with: **Olympus Tough**

EPA Property Tag: **SC7374**



Picture 1 – Main Office Universal Waste Lamp box



Picture 4 – Hazardous Waste Storage Area (HWSA)



Picture 2 – Main Office Universal Waste Lamp box



Picture 5 – HWSA container pending decanting



Picture 3 –Hazardous Waste Storage Area



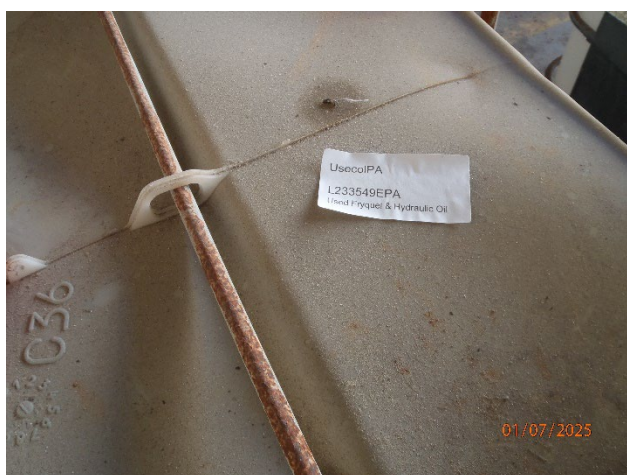
Picture 6 – HWSA container pending decanting - empty



Picture 7 – HWSA used oil container label



Picture 10 – HWSA used oil container label



Picture 8 – HWSA used oil container label



Picture 11 – HWSA used oil pads



Picture 9 – HWSA used oil containers



Picture 12 – HWSA used oil containers



Picture 13 – HWSA spent aerosol can container



Picture 16 – HWSA used oil and universal waste containers



Picture 14 – HWSA containers labeled during inspection



Picture 17 – HWSA universal waste battery label



Picture 15 – HWSA universal waste batteries



Picture 18 – HWSA spent aerosol container label



Picture 19 – HWSA spent aerosol container label



Picture 20 – HWSA Roll-off label



Picture 21 – HWSA Roll-off



Picture 22 – Maintenance oil center containment pallet



Picture 23 – Maintenance oil center containment pallet

Picture 24 – HW Manifest with description discrepancy